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ABSTRACT

Primary tasks of this project were to locate, analyze, and synthesize (1) the available evidence for allegations that students receiving Federal aid for postsecondary education were being subjected to institutional malpractice and (2) the various suggestions and recommendations for protecting students from such claimed abuse. Improvement strategies were grouped under two major headings: (1) The regulatory approach, in which attempts could be made to better prevent or control abusive types of conditions, policies, and practices, resulted in regulatory and accreditation user guides. (2) The non-regulatory approach, in which improvements could be made in the education of student consumers themselves, to identify, avoid, or deal properly with institutional abuses, resulted in the student's consumer guide. Information collection and analysis instruments and procedures were developed, pilot tested, and field tested. Major products of the project (the information collection, analysis, and use mechanism guides for its use by accreditation and regulatory agencies, and the student's consumer guide) represent preliminary, partially-validated strategies. These strategies can contribute to meeting several immediate needs of institutional self-study, setting minimum eligibility standards, an "early warning" system, and the basis of a formal communication network in the tripartite eligibility system. (The report contains a literature review and summary, method description, data analysis and field testing results, discussion, conclusions, and recommendations. Appendixes include the instruments, data, list of participating institutions, and other related material.) (TA)

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FINAL TECHNICAL REPORT

IMPROVING THE CONSUMER PROTECTION FUNCTION
IN POSTSECONDARY EDUCATION

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All of these people should share credit for any useful and wise aspects of the products documented here; the blame for any impractical and unwise aspects which remain rests with the authors.

INTRODUCTION

Origins of this Project

The federal investment in postsecondary education student assistance programs administered by the U.S. Office of Education (USOE) totaled approximately $8.4 billion during fiscal years 1972 through 1976. This investment allowed over nine million students to seek an education beyond high school. Early in 1975, considerable concern was being voiced both within and outside the government regarding a large number of alleged abuses of students who were the recipients of this federal aid. The abuses which received most attention occurred in proprietary occupational training schools; however, abuses were also recorded in private non-profit and public institutions, both in occupational training contexts and in degree granting higher education contexts. Misleading and inaccurate advertising, failure to grant student refunds, and false promises of job placement and post-training earnings topped the list of cited abuses. There was pressure from Congress to stem such institutional abuses, especially in the case of students who were receiving Guaranteed Student Loans, where federal payments to cover loan defaults soared from $25 million in FY 1972 to $202 million in FY 1976, an eightfold increase during a period when loan volume remained relatively stable.

Suggestions abounded on how postsecondary students could be better protected. Suggestions came from a federal interagency subcommittee on educational consumer protection, from two national student consumer protection conferences, from the National Advisory Council for Education Professions Development, from the Federal Trade Commission, from Congress, from the media--literally from all sides. But these suggestions were sometimes conflicting, often vague, uncoordinated, and lacking in empirical support.

In July of 1975, the American Institutes for Research (AIR) was awarded a contract by USOE to develop improved consumer protection strategies for postsecondary education. One of the first tasks carried out under that contract was to locate, analyze, and synthesize (a) the available evidence for allegations that students were being subjected to institutional malpractice and (b) the various suggestions and recommendations for protecting students from such claimed abuse. A comprehensive literature search produced a wealth of "expert opinion" about the nature of consumer protection needs in postsecondary education but precious little data on the actual extent of presumed institutional abuses of students or the degree to which students themselves perceived various institutional practices to be abusive. Of most relevance were "case studies" of student abuse contained in Congressional hearings, media exposés, and USOE's own investigations of schools which were eligible for federal assistance programs; however, these did not provide a sufficient basis for the many improvement recommendations because they gave no true indication of the magnitude of the problem and no specific guidance as to solutions.

The bulk of the improvement recommendations which were offered in the literature could be grouped into three major categories: (a) improving the system by which postsecondary institutions were regulated and through which they gained eligibility to participate in USOE-administered programs; (b) improving the quality and quantity of information which was available to students in selecting postsecondary options; and (c) providing students with better mechanisms to seek and obtain redress of grievances.

Determining the Nature of Student Consumer Abuse

The next major task was to identify institutional practices which could mislead students and frustrate even their well-made decisions. Admittedly, there was a thin line between "sharp" business operations and educational malpractice. Because of the inconsistent and complex network of federal, state, and local laws and regulations which govern postsecondary education, school practices which were potentially illegal in one location might be permissible in another. Furthermore, because the pattern of laws and regulations was constantly changing, through new legislation or administrative and judicial reinterpretation, practices which were legal at one time might be illegal at a later time. Consumer advocates generally agreed, however, that abuse depended on creating conditions which led the consumer to make a decision that (a) was based on inaccurate or incomplete information and (b) was not in his or her best interest.

Through an analysis of institutional conditions which led to well-documented student complaints, we produced a preliminary set of "potentially abusive institutional conditions, policies, and practices." In this analysis, we accepted the fact that students are capable of excessive subjectivity, deception and making unfair complaints; an attempt was made to use only verified complaints, i.e., those which were accompanied by external evidence that the complaint had resulted from an actual institutional condition, policy, or practice. The preliminary set was augmented with case study material from the literature, resulting in a final set containing the types of abuses listed in Table 1.

Table 1

SUMMARY OF INSTITUTIONAL ABUSE CATEGORIES DERIVED FROM STUDENT COMPLAINT ANALYSIS AND LITERATURE

1. Inequitable refund policies and failure to make timely tuition and fee refunds.
2. Misleading recruiting and admissions practices.
3. Untrue or misleading advertising.
4. Inadequate instructional programs.
5. Unqualified instructional staff.
6. Lack of necessary disclosure in written documents.
7. Inadequate instructional equipment and facilities.
8. Lack of adequate job placement services (if promised), and lack of adequate follow-through practices.
9. Lack of adequate student selection/orientation practices.
10. Inadequate housing facilities.
11. Lack of adequate practices for keeping student records.
12. Excessive instability in the instructional staff.
13. Misrepresentation or misuse of chartered, approved, or accredited status.
14. Lack of adequate financial stability.

Improved Consumer Protection Strategies

The project's literature review and synthesis (see Helliwell & Jung, 1975) made it clear that improvement strategies could be grouped under two major headings: (a) the regulatory approach, in which attempts could be made to better prevent or control the types of conditions, policies and practices of the kinds listed in Table 1; and (b) the non-regulatory approach, in which improvements could be made in the education of student consumers themselves, so they could identify, avoid if possible, or deal properly with institutional abuses of the kinds listed in Table 1.

Regulatory Approach. The first decision we made with regard to regulatory strategies was to accept as a given the current "tripartite" system of institutional eligibility determination. We did not regard it as our role to attempt to change this congressionally-mandated system; rather, we sought strategies which would allow it to function better. The tripartite system, or "triad," is discussed in detail in the next section; briefly, and ignoring several complications, it is a system in which an institution applying for eligibility must: (a) be legally authorized to operate by the state in which it is located; (b) be accredited by a private, non-governmental accrediting body officially recognized and listed by USOE; and (c) meet the provisions of the specific student aid programs in USOE. Ultimately, institutional eligibility determinations are made by USOE's Division of Eligibility and Agency Evaluation[1] (DEAE), which reviews an institution's application for eligibility to insure that the federal statutory requirements have been satisfied, including the regulations applicable to each student assistance program. For example, over 8,300 postsecondary institutions are recognized as eligible for participation in the Guaranteed Student Loan Program, which is the largest of the USOE-administered student assistance programs.[2]

It was further decided (see Jung, Hamilton, Helliwell, McBain, & Fernandes, 1975) that the most useful aid to the tripartite system would be a data collection and dissemination mechanism which would: (a) define, in very specific and unmistakable terms, the institutional conditions, policies and practices which were considered to be abusive to students; (b) serve an "early warning" function for the tripartite agencies (i.e., the state licensing and approval agencies, the non-governmental accreditation agencies, and the student aid program offices in USOE); (c) serve to promote much needed communication among these agencies; and (d) promote voluntary self-improvement by eligible institutions. Due to its role as coordinator of the tripartite system, DEAE was viewed as the center for the data collection and dissemination mechanism.

A critical requirement for the information collection and dissemination mechanism was data which were very descriptive of abusive institutional practices, subject to relatively clear interpretation by both institutions and regulatory users. The data had to be:

---

[1] Formerly and still widely known as the Accreditation and Institutional Eligibility Staff (AIES), Bureau of Postsecondary Education. DEAE is also responsible for administering the process by which accrediting agencies secure initial and continued USOE official recognition and listing.

[2] Other programs are: Basic Educational Opportunity Grant (BEOG), Supplementary Educational Opportunity Grant (SEOG), College Work Study (CWS), and National Direct Student Loan (NDSL).

- related to institutional policies and practices which are generally agreed to be abusive;
- quantifiable, such that similar institutions could be compared on a common scale;
- verifiable, so that disagreements in scaling could be easily resolved;
- useful to institutions themselves in their own self-improvement efforts; and
- related to institutional policies and practices which are modifiable and within the power of the institution to modify.

Toward this end, AIR staff developed Institutional Report Forms (IRF's) for degree granting and occupational training institutions, a quantitative scoring system for the forms, and a set of suggestions for how the scores might be used to: (a) foster self-improvements in an institution's consumer protection functioning; (b) provide advance warning to trigger more intensive regulatory attention by the agencies in the tripartite system; and (c) serve as the basis for regular, formal communications among these agencies.

The process we went through to produce the mechanism for information collection, analysis and use will be documented in the Methods section of this report. The Results section contains a summary of data gathered during a field test conducted early in 1976 at 37 institutions in three states. It also contains a description of the actual mechanism, which, unfortunately, is somewhat limited in its usefulness because of changes required by the Office of Management and Budget (OMB) prior to its field test. Nevertheless, possible uses are described in two user guides, one for government regulatory agencies and one for accreditation bodies.

Non-Regulatory Approach. It seemed clear that well-publicized concerns with increasing government regulation of postsecondary institutions constituted significant barriers to the progress of regulatory efforts to control abusive institutional practices. We therefore attempted to develop a strategy for bringing about major improvements in postsecondary student protection which did not require any change in present governmental regulation. This "student-based" consumer protection strategy had three parts. The first part was the already mentioned identification of institutional conditions, policies and practices having the potential for student abuse. The second part was based on effective techniques for allowing students to acquire this information on their own. The final part was a set of suggestions for student use of this information to avoid or deal properly with such policies and practices.

The idea of providing consumers with "better information" to facilitate more informed decisions was not a new one. Yet it had not seemed to bear fruit as a practical improvement strategy in education. We felt the idea had consistently become bogged down because of failure to realize the differences between information needed for better student decision making in general and information needed for improved consumer protection. The latter seemed but a small subset of the former. In making decisions about whether or not to seek a postsecondary education, what type of education to seek, what institution to attend, etc., students need a great deal of information. Needed information includes not only the various options available at particular institutions, the requirements and costs of each and financial aids available, but also insight into the world of work and an individual's own goals, interests, abilities, limitations, etc. Information of this type is a great aid in improved decision making. However, students also need to know about institutional policies and practices which can mislead them in their decision making and frustrate their goal attainment once a decision has been made. Only the latter type of information, the limited subset of consumer protection information, was of concern during this project.

Many authors have suggested lists of things students "ought to be taught" to make better educational decisions. In addition to missing the essential distinction between information for better general decision making and information for avoiding abuse, this orientation has the tendency to assume that students are minions who have an almost unlimited capacity to absorb large amounts of comparative institutional data and to regurgitate and use it upon demand. The usual mechanism for channeling this flow of information to students has been the secondary school counselor. Countless calls have been registered for "more and better school counseling services," assuming first that counselors have the time and expertise to seek out consumer information for their counselees, second that students oriented toward postsecondary education will put much faith in information they receive from such a source, and third that most postsecondary-oriented students utilize counseling services in secondary schools.

We rejected these assumptions in favor of another set. The alternative set proposed that all students, at the time they are making a postsecondary education decision, exhibit some degree of personal concern and uncertainty.

During this stage (not so much before or after), they are willing to make a small investment of their own time, energy and talent to acquire a small set of information which will help them to avoid educational malpractice. They will most trust that information which they can acquire (or at least validate) on their own, without requiring the involvement of a counselor or government regulatory agency official. They will be most likely to be able to use information which does not require sophisticated interpretation or statistical transformation.

We knew information about the presence or absence of abusive conditions, policies and practices could be acquired by students or prospective students themselves if they had easy access to a "how to do it" guide at the time they were actually confronted with the need to make a decision. We also knew the information could be used if it included suggestions for identifying minimum acceptable risk levels and, based on the information obtained, ruling out alternatives which seemed to fall below those levels. If a postsecondary education choice seemed to be above the minimum level, but still to entail some potential for abuse, the strategy could also demonstrate techniques for issuing effective complaints or initiating grievances.

The non-regulatory strategy we developed is embodied in a 44-page student guide, with two associated audio cassette tapes; it is entitled Safeguarding Your Education: A Student's Consumer Guide to College and Occupational Education. Its development is described in the Methods section of this report and the product is described in the Results section.

Limitations of this Study

We do not regard this as the definitive study in improving educational consumer protection. Much more needs to be done and is being done. The major products of this project (the information collection, analysis, and use mechanism, guides for its use by accreditation and regulatory agencies, and the student's consumer guide) represent preliminary, partially-validated strategies. They should undergo a more extensive period of empirical validation and refinement. All partners in the postsecondary education enterprise, including representatives of students and postsecondary institutions, should be involved in assisting in and observing the results of this validation and refinement.

The strategies as they exist now, however, can contribute in a meaningful way to meeting several immediate needs. In the Follow-up Implications section, we list some of the contributions we feel they can make if USOE chooses to implement them.

We fully realize that in the past some students have deliberately cheated schools and the state and federal assistance programs. This study, however, has been directed only toward preventing institutional abuses of student consumers. Other studies will be required to address the problem of abuses perpetrated by students and the relationship of these abuses, if any, to institutional abuses.

A LITERATURE REVIEW AND SUMMARY

This section contains a synopsis of the AIR literature search mentioned in the Introduction. It is current only to the end of December, 1975 (see Helliwell & Jung, 1975).

Review of Current Status

Abuses of Postsecondary Education Consumers

The consumerism movement which has swept the country has not left postsecondary education untouched. Series of articles in the popular press (e.g., the Boston Evening Globe, 25 March-1 April 1974; the Washington Post, 24 June-26 June 1974; and the Chicago Tribune entered into the Congressional Record--Senate, 10 July 1975) have called public attention to consumer abuse in proprietary (for-profit) occupational training institutions, although it is recognized that problems also occur in other types of postsecondary schools. The testimony of former U.S. Commissioner of Education T.H. Bell before the Federal Trade Commission (Bell, 1974) summarizes the situation.

> ...the vast majority of postsecondary schools and programs are doing an honorable job of serving the Nation. However, a number of common malpractices have been identified in a relatively small number of schools. They are found not only in proprietary (private, for-profit) institutions but also in public and private-nonprofit institutions. These malpractices include:
>
> (1) misleading and inaccurate advertising;
> (2) indiscriminate and overly aggressive recruiting;
> (3) lack of full disclosure of salient institutional characteristics and information needed by the student consumer;
> (4) inferior facilities, course offerings, and staff;
> (5) false promises of job placement and earning opportunities;
> (6) inadequate refund policies (or failure to abide by stated policies). (p. 1)

Since the student "contracts" with an institution to purchase educational services s/he expects will be of personal benefit and then invests time, energy, and money in the pursuit of programs of self-development, students may be considered the primary consumers of education (Willett, in ECS, 1974, pp. 78-88; and FICE, 1975). They, of course, suffer when postsecondary educational institutions engage in abusive practices, but other groups are hurt as well.

The educational community is affected. Charges leveled at unethical institutions tend to implicate those that discharge their responsibilities fairly and well. The review of the Globe's allegations against proprietary schools in the Boston area conducted by DEAE (Pugsley & Hardman, 1975) noted that enrollment and prospective student inquiries at proprietary technical and trade schools "rapidly declined after the publication of the series, by estimates ranging from 35 to 50 percent." (p. 13) Colleges are increasingly coming to recognize that public opinion affects their financial and academic affairs. Public confidence in higher education has declined in the past 25 years (Shulman, 1975). Surely, widely publicized claims of malpractice and consumer abuse will not help the situation.

Members of the general public also lose when postsecondary educational institutions engage in malpractice. As the proposed "Postsecondary Education Consumer Protection Act of 1975" (H. R. 2786) put it, "The Nation has suffered substantial losses of human, financial, and educational resources because of the unethical actions of some administrators, recruiters, and other persons associated with eligible postsecondary educational institutions." (Bell & Pettis, 1975, p. 2) Taxpayers are hurt when public funds do not achieve the purposes for which they were intended and when disillusioned students default on guaranteed loans.

Much more has been written about abuses in the proprietary occupational education sector than about those that occur within the ivy-covered walls of higher education. Proprietary schools' advertising and recruiting practices come under heaviest attack (Newburg-Rinn in ECS, 1974a; Pugsley & Hardman, 1975). However, Harold Orlans and his collaborators (Orlans, Levin, Bauer, & Arnstein, 1974) have discussed at length examples of fraud and malpractice at accredited colleges and universities. Examples of many of the same practices for which proprietary schools are criticized are presented in journalistic exposé style. Business malpractice and fraud, athletic scandals, and advertising and recruiting improprieties are cited as evidence that consumer protection is needed in all sectors of postsecondary education.

Consumer Protection Needs

The consumer protection issue has been analyzed in various ways. Perhaps the most straightforward conceptualization is Hoyt's (in ECS, 1974a, pp. 39-57) description of two complementary approaches. "Quality control" can protect consumers from practices and conditions which they are unlikely to detect initially. The "comparable facts" approach can provide consumers with information to enable them to make wise choices.

Nelson (in ECS, 1974a, pp. 57-64) identified two basic thrusts in the consumer movement in postsecondary education. The first thrust is to hold accountable the person or organization to whom the consumer pays money. Minimal conditions of accountability in postsecondary education include doing no harm (e.g., permitting/encouraging someone to waste time is harmful), delivering the goods, and providing redress of grievances. The second thrust reflects an insistence that the government perform the role of an umpire, making and enforcing rules for traffic between buyer and seller so that equity between them may be achieved in what could be regarded as a contractual relationship.

Rights and responsibilities of participants in the postsecondary educational marketplace have been repeatedly addressed. From the consumer's point of view, Willett(in ECS, 1974a, pp. 78-88) has listed these rights: "the right to choose products and services, the right to accurate information, the right to health and safety..., and the right to be heard and to have...dissatisfaction duly registered." (p. 84) She believes that a balance between the rights and responsibilities of all participants in education can be brought about by the same mechanism used in the traditional marketplace--investigations of consumer concerns, due process, and legislation.

Three basic themes of educational consumer protection emerged in the literature. They are redress mechanisms, better information for consumers, and regulation. Redress and the information needs of consumers will be discussed here. The regulation aspects of consumer protection will be discussed later in this section.

Redress. The FICE Subcommittee on Educational Consumer Protection (1975) has stated: "No organized and well-publicized mechanism exists at any level to handle complaints concerning educational consumer problems." (p. 63) Orlans, et al. (1974) noted that "government and private agencies have no uniform way of handling [education-related complaints] and many are shuttled back and forth inconclusively." (p. 453)

We assume that states' procedures for complaint handling and redress vary across states, although no data on these procedures were found in the course of our searches. The Orlans report, however, does cite USOE's criticism of state agencies' indifference to consumer interests (Orlans, et al., 1974, p. 455). Under the "Mondale amendment," the Commissioner of Education can recognize state agencies for approval of public postsecondary institutions in their state. To gain this recognition, an agency is required to have "written procedures for the review of complaints pertaining to institutional or program quality as these relate to the agency's standards, and demonstrate ...that such procedures are adequate to provide timely treatment of such complaints in a manner fair and equitable...." (AIES, 1975b, p. 4). Only 12 state agencies are currently so recognized.

A redress procedure is available in the Model State Legislation prepared by the Education Commission of the States "Task Force on Model State Legislation for Approval of Postsecondary Educational Institutions and Authorization to Grant Degrees." Basically, the procedure requires the student to file a complaint with the state agency or commission granted authority to approve or authorize institutions under the legislation. After investigation, the agency or commission passes judgment on award of relief or restitution. It may also issue cease orders, impose penalties or revoke authorization or salesmen's permits. Judicial review of judgments and civil or criminal penalties are possible (ECS, 1973).

Private accrediting agencies must meet a complaint review requirement similar to that required of state agencies to receive the Commissioner of Education's recognition. The actual efficiency of their grievance and redress procedures is uncertain, however. Orlans, et al. (1974) suggest that the proprietary school accrediting agencies have accepted and executed promptly and responsively a role as USOE's intermediary on complaints regarding refunds, advertising, and soliciting practices of their member institutions, but that the regional and some specialized accrediting agencies have been unreceptive to complaints, regarding such a "policing" function as incompatible with their basic purposes.

DEAE refers most of the student complaints it receives to accrediting agencies for investigation, although in special cases it may investigate itself or consult USOE's regional offices or appropriate state agencies

(Herrell, 1974). There has been no clear statement of the types of redress which are typically afforded the complainants in these cases.

Information. Providing educational consumers with complete, accurate, and up-to-date information on their various postsecondary options is a much discussed consumer protection strategy. The underlying assumption is that with information about available alternatives the consumer is able to (a) choose the one that best meets his or her interests and needs and (b) avoid inferior institutions or programs that may engage in abusive practices. It is necessary to note again the important but often ignored distinction between information needed for improved educational decision making and information needed for improved consumer protection. The latter is only a small subset of the former, and we have concentrated only on consumer protection information in our review.

The literature on postsecondary consumer protection information discusses three basic categories: (a) objective data about institutions, their programs and their practices; (b) judgments regarding their quality; and (c) information about regulatory agencies' decisions regarding institutions and programs. Accrediting agencies and other groups that assess institutions' quality normally require only the first type of information. Regulatory agencies at the federal (e.g., the Federal Trade Commission) and state (e.g., state licensing and approving agencies) levels, and federal agencies charged with determining institutional eligibility for financial assistance, usually use the first two types of information, although they could certainly profit from knowing about the regulatory decisions of other agencies or groups. Postsecondary education consumers could benefit from all three major types of information in making decisions to avoid or deal properly with institutions which have a history of using potentially abusive practices.

However, postsecondary educational consumers currently have little access to quality judgments or regulatory agency actions. Accrediting agencies publish lists of only the institutions that have achieved accredited status. Orlans, et al. (1974) criticized accrediting agencies and USOE because the names of institutions which were denied accreditation, disaccredited, put on probation, found in noncompliance with designated standards, or which never applied for accreditation are not published. The deliberations of accrediting agencies and the reports of evaluation teams are confidential. To our knowledge, there is no group that rates the quality of a majority of postsecondary alternatives and distributes this information widely. Further, regulatory agencies are repeatedly criticized in the literature for not sharing critical information among themselves, not to mention with educational consumers.

Current Systems of Postsecondary Governance, Institutional Eligibility, and Consumer Protection

Two aspects of consumer protection have been discussed: (a) grievance and redress procedures, and (b) provision of comparable information to consumers to facilitate choice of postsecondary educational options. In this section three systems related to postsecondary education will be discussed: (a) the governance system; (b) the system for determining institutional eligibility for federal financial assistance; and (c) the so-called consumer protection system.

Governance. The main assumption underlying the governance system's role in consumer protection is that by regulations, monitoring, and enforcement of rules, institutions will be prevented or stopped from abusing students or potential students. The current system for governing postsecondary education consists of three elements: the federal government, the states, and the private accrediting agencies. Each element has its own unique interests and functions, but they are also interrelated and share common concerns and activities. Much of the following discussion is based on Kaplin (1975).

The federal government's authority to regulate education is limited by the Constitution. The United States has no counterpart to the Ministry of Education found in other countries. The government's major function is establishing priorities and providing funds according to these priorities. It does not have the power to regulate education except through "spending power" and "commerce power." The government can establish purposes and conditions for expenditure, but educational institutions can avoid these requirements by refusing to accept funds.

The states have broad regulatory powers to match their broad educational functions. They can claim all governmental powers not denied them in the federal constitution or their own constitutions. They have spending power, power over their own public institutions, and broad regulatory powers (police powers) over private activity affecting public health, safety, or general welfare. There are basically two levels of state regulation of non-public postsecondary education, although these levels are not found in every state nor are they always distinct. The first level is incorporation or chartering, which does occur in every state. Incorporation laws, which set forth the conditions a non-public institution must meet to come into existence, vary in specificity among states. The second level is licensure. This is a more substantial form of regulation because it includes educational requirements as well as corporate ones. Not all states have licensure requirements, and their strength and enforcement varies where they exist.

Accrediting agencies are voluntary, private associations of member institutions. They were originally established so that (a) peer reviews of the quality of education offered at member institutions could be conducted and (b) the public could be assured that the graduates of certain professional schools (e.g., medicine and law) were competent to practice. Consequently, there are two basic types of accreditation. Regional and some national accrediting associations conduct institutional accreditation, under which an entire school is accredited. Specialized accreditation is conducted by national associations which accredit one department or program within an institution, usually one that has already been regionally accredited.

Today the primary function of accreditation is disputed. USOE, which by statute relies on the judgments of accrediting agencies it recognizes as one element in gaining eligibility for federal financial assistance programs, considers their primary function to be one of certifying that an institution has met established standards of quality. However, the institutional accrediting community especially has disputed this view, arguing that institutional and program self-improvement is accrediting's main goal and that accreditation only certifies that an institution is meeting its own stated purposes.

Institutional eligibility. As previously stated, USOE administers five student assistance programs: Basic Educational Opportunity Grants (BEOG), Supplemental Educational Opportunity Grants (SEOG), College Work-Study (CWS), National Direct Student Loans (NDSL) and Guaranteed Student Loans (GSL). Institutional eligibility for these aid programs is established at two levels. General eligibility determinations are performed by DEAE, which reviews an institution's application according to certain criteria which vary slightly among public and private non-profit institutions and proprietary schools. These criteria relate to the types of students admitted (high school graduates or equivalent), legal (state) authorization to operate, length of program and degree or training offered, type of control, accreditation (or certification by three accredited institutions to which credits offered by the institution are transferable) and civil rights compliance (Herrell, 1974). The second level of eligibility determination is established by the individual program offices in USOE. Eligibility determinations for specific assistance programs are performed according to the specific statutes and regulations applicable to those programs.

The Office of Education relies heavily on accrediting agencies to assess the qualitative factors in determining eligibility. In order to justify this reliance, USOE must, in essence, "accredit" the accreditors. The Veterans Readjustment Assistance Act of 1952 was the first piece of legislation which required the U.S. Commissioner of Education to publish a list of nationally recognized accrediting agencies and associations which he determined to be reliable authorities as to the quality of training offered by an educational institution. This requirement has been repeated in subsequent legislation. Twenty-one federal agencies outside USOE also rely on the Commissioner's list (Herrell, 1974). As noted earlier, state agencies may also be recognized for approval of public postsecondary vocational education and nurse education institutions in connection with eligibility determinations.

DEAE is responsible for administering the process by which accrediting and state agencies secure initial and renewed recognition. It also provides support to the Commissioner's Advisory Committee on Accreditation and Institutional Eligibility which is mandated to review policies and legislation, to suggest changes, recommend criteria and procedures for recognition of accrediting and state agencies, and review applications for recognition and make recommendations upon them (AIES, 1975a).

Consumer protection. The consumer protection system for postsecondary education in the United States was described in the FICE (1975) subcommittee report. As with the governance and eligibility systems previously discussed, the federal government, states, and accrediting agencies play a role. Consumer organizations are also involved.

The states and accrediting agencies seem to do little in terms of protecting educational consumers beyond what has already been described. However, Willett(in ECS, 1974a) noted that each state has appointed an assistant attorney general for consumer protection.

A variety of agencies provide assistance to educational consumers including "national consumer advocate associations, Better Business Bureaus, municipal consumer officials, various ombudsmen, and the growing number of groups seeking to organize, defend and protect consumers. Trade unions have also stepped up their interest in the consumer field, and private business is becoming increasingly responsive." (FICE, 1975, p. 39)

The consumer protection policies of four federal agencies are noted below, although at least twelve others (Bureau of Health Resources Development, Social Security Administration, Department of Defense, Department of Housing and Urban Development, Bureau of Indian Affairs, Law Enforcement Assistance Administration, Immigration and Naturalization Service, Department of Labor, Federal Aviation Administration, Federal Communications Commission, Postal Service, and Civil Service Commission) have engaged in some form of activity in this area.

The Office of Consumer Affairs (OCA) in the Department of Health, Education, and Welfare serves mainly as a liaison between private consumer organizations and federal agencies responsible for educational consumer protection, although it does handle some complaints. "OCA basically promotes educational consumer protection from within the Federal and State governmental structure, and advocates 'self-help' mechanisms within the private sector." (FICE, 1975, p. 21)

The DEAE and Commissioner's Advisory Committee are the Office of Education components whose activities have greatest bearing on consumer protection, since many federal and other agencies base eligibility decisions on the DEAE judgments or judgments of recognized private accrediting agencies. DEAE also makes general institutional eligibility decisions, and reviews complaints. The Committee makes recommendations on legislative changes regarding institutional or program eligibility for federal funds.

The Federal Trade Commission has been active in consumer protection in the proprietary vocational sector of postsecondary education. It has been answering consumer complaints for several years, has published guidelines to inform schools of what are considered deceptive and unfair practices, has conducted a multi-media consumer education campaign, has engaged in litigation, has evolved a plan for federal/state cooperation and coordination, and has proposed a binding trade regulation rule which requires information disclosure, pro rata tuition refunds, a ten-day cooling-off and reaffirmation period, and disclosure and advertising substantiation (FICE, 1975).

The FICE Subcommittee on Educational Consumer Protection is concerned with achieving better coordination of the federal agencies involved in educational consumer protection, determining a federal mechanism for this purpose, exploring legal questions regarding the role of the government, developing and disseminating information, and facilitating federal-state cooperation and coordination. FICE has cooperated with ECS and other agencies in preparing the Model State Legislation, sponsoring the National Invitational Conferences on Educational Consumer Protection, and developing educational materials (FICE, 1975).

Mutual perspectives. Governance, eligibility, and consumer protection in postsecondary education are three complex systems built upon interrelationships of the federal government, accrediting agencies and the states (and, in the case of consumer protection, other agencies as well). The federal government supports accreditation. However, both Herrell and Bell indicated that the federal government is engaged in nudging accrediting agencies toward more public accountability (Bell, 1974, p. 8; and Herrell, 1974, p. 10). Mr. John Proffitt, Director of DEAE and Executive Secretary of the Commissioner's Advisory Committee on Accreditation and Institutional Eligibility, stated the position more directly: "Our most pressing task, then, in the quest for accountability must be to devise new mechanisms for regeneration in accreditation." (Proffitt, 1971, p. 9)

Accrediting agencies regard federal efforts with concern. Dickey and Miller (1972), at that time Executive and Associate Directors of the

National Commission on Accrediting, suggested that the growing relationship between the government and accrediting agencies might lead to greater direction and regulation of the latter by the former. They feared that this would "result in the federal government gaining a beachhead in establishing educational standards and practices. The threats are sufficient to warrant serious consideration of future relationships...." (p. 138) They assumed that "Growing federal control over accreditation carries with it the potential for considerable control over educational practices and standards. This violates the traditional role of the federal government in education, if not its constitutional authority." (p. 141)

The federal government also seems to favor "...increased reliance on State agencies to provide added consumer protection in postsecondary education.... One salient advantage in using State agencies, when they are efficient and effective, is that they generally can provide closer surveillance and oversight, and can react more quickly, than can a regional or national organization or agency." (Herrell, 1974, p. 24) The qualifier in the sentence above suggests that not all states are viewed as performing the consumer protection function satisfactorily. Bell (1974) listed USOE's efforts to improve the eligibility determination system. Efforts to strengthen the state approval process were "based upon the premise that governance of education is a fundamental responsibility of the States." (p. 5)

Representatives of the states believe that "the federal role in consumerism in education has been minimal." (Ashler in ECS, 1974a, p. 8) Clark (1975) noted that "...critics still maintain that the states have not done a good or thorough job of providing accountability." (p. 2) While he acknowledged that state efforts could be improved, he cited a research brief prepared by the National Association of State Administrators and Supervisors of Private Schools which "indicated that states had made a more concerted effort to regulate post-secondary vocational education than was heretofore known or acknowledged." (p. 4)

It is consistent with the states' desire to do more in the area of consumer protection that they believe "accreditation was never designed to eliminate fraud or thwart the practices leading to deception and misrepresentation." (Clark, 1975, p. 6) "...the critics of state accreditation are wrong when they support a system [of regional and national accreditation] that is badly flawed, does not resemble its original purpose and is sought for the wrong reasons." (Clark, 1975, p. 5)

Review of Improvement Recommendations

It is generally recognized, then, that consumer protection in postsecondary education is currently inadequate. In this section, suggestions for meeting some of the major consumer protection needs are discussed.

Redress

Suggestions for improving grievance and redress procedures for the educational consumers may be categorized by the group or agency assigned primary responsibility for them. Willett (in ECS, 1974a) argues that the student is in the center of the educational marketplace and therefore suggests that student organizations publish their problems with schools to their peers, establish their own complaint process, and work with schools and other consumer protection groups or agencies to find solutions. Stark (1975) and ECS (1974b) both recommend that the institutions themselves establish and disseminate grievance and redress procedures. Seminar III of the Second National Consumer Protection Conference (ECS, 1975) proposed that these procedures range from informal to structured and that student ombudsmen assist in implementing them. Stark further suggested that if intrainstitutional mechanisms were inadequate, an interinstitutional tribunal be established to avoid the possibility of a governmental redress mechanism.

The National Advisory Council on Education Professions Development (NACEPD, 1975), and another seminar at the Second National Conference (ECS, 1975) proposed that the states supply grievance and redress mechanisms. One mechanism described earlier in this section is available in ECS's Model State Legislation. The "Gatekeepers" report of the National Advisory Council cited above recommended that the states' licensing authorities keep statistical records of complaints, offer redress, and "crack down" on repeated offender institutions by suspending their licenses to operate. Still another seminar at the Second National Conference suggested that institutions should publish their refund policies, the states should require consistency among them, and students' appeals should be handled by the institution, the state, or the courts.

Numerous calls for a central national complaint clearinghouse have been made (e.g., FICE, 1975; ECS, 1974b and 1975; and Bell, 1974). Three functions for the clearinghouse have been proposed, although not all authors suggest each one. The clearinghouse could provide redress itself or refer a complaint to an appropriate agency for action, it could serve a research and communication function alerting appropriate agencies to investigate possibly offending institutions, and it could deal with institutions engaged in malpractice by enforcing regulations or encouraging other agencies to do so.

Information

Of the three types of consumer protection information discussed on page 13, most of the suggestions for providing students with more and better information concerned the first type--objective, comparable data on postsecondary educational alternatives. Some authors did suggest providing consumers with judgments of institutions' quality, but most of the discussion surrounding regulatory agencies' decisions concerned improving information flow among regulators.

Disclosure of objective information on alternatives to postsecondary educational consumers was a popular consumer protection strategy in the literature reviewed. As Orlans, et al. (1974) noted, "To inform students adequately, some critical and possibly damaging institutional information must be published...." (p. 29) However, institutions have rights as well as consumers, and some caution must be introduced into the calls for complete disclosure. The Orlans report recommends that "a series of trials should be undertaken to determine the kinds of information that can and cannot, should and should not be regularly collected and/or issued about all postsecondary institutions and special groups and samples." (p. 26)

Finally, the literature notes various problems with collecting and disclosing certain types of data in meaningful ways. Employment, earnings, and attrition information have been most problematic (e.g., Bell, 1974; and ECS, 1975). Various strategies have been proposed for making information about postsecondary educational options available to consumers. Basically, the proposals fall into two types: one in which the institutions themselves make the information available directly to consumers, and the other in which information is collected from institutions and made available to consumers by some outside agency.

It is usually suggested that institutional disclosure occur in catalogs or similar documents. The Fund for the Improvement of Postsecondary Education recently funded a national project in which selected institutions are preparing "educational" prospectuses to describe the type of experiences they offer. The intent of the project is to determine what institutions themselves can do to set information standards (DHEW, 1974). Stark (1975), speaking to the higher education community, noted that institutional efforts aimed at improving communication with educational consumers are alternatives to government regulation of this area.

Federal and state agencies have already begun to mandate better information flow to consumers. The Terms of Agreement institutions must sign to participate in the GSL program require them to make good faith efforts to inform prospective students about the institution, its programs, faculty, and facilities. Special additional requirements apply to institutions offering occupational training. They must disclose employment and earnings data on their graduates to students prior to enrollment (USOE, 1975). In interpreting fair trade laws that affect proprietary vocational training schools, the Federal Trade Commission issued guidelines on affirmative disclosures prior to enrollment (FTC, 1972). The guidelines indicate that written information on academic progress policies, additional costs, facilities, equipment, class size, placement services, and other facts likely to influence enrollment decisions should be furnished to prospective students before they sign enrollment contracts. The ECS (1973) Model State Legislation, which has been adopted by several states (e.g., Tennessee, North Carolina, and Montana), requires institutions to provide students and prospective students with a catalog or brochure describing the programs offered, program objectives, length of program, tuition and other charges, cancellation and refund policies, and other facts in order to obtain state authorization to operate. Further regulation of institutional disclosure is likely, as evidenced by pending legislation and regulations (e.g., FTC's proposed trade regulation rule for proprietary vocational and home study schools, FTC, 1975; Postsecondary Education Consumer Protection Act of 1975, Bell & Pettis, 1975; and proposed amendments to the Higher Education Act called the Student-Financial Aid Act of 1975, U.S. Congress, 1975).

Recommendations for establishing central dissemination mechanisms were the major strategy proposed for outsiders to provide information to consumers about all postsecondary educational institutions or programs. None of the sources reviewed suggested that the federal government establish and run such a dissemination center for information on postsecondary options, but the Second National Conference on Consumer Protection (ECS, 1975) indicated that the federal government should establish standard definitions for information and provide funding for national level and state level centers.

Systems of Postsecondary Governance, Institutional Eligibility, and Consumer Protection

The preceding recommendations for improving consumer protection dealt mainly with protecting students through better informed decision making and grievance and redress procedures. This section presents a brief overview of some of the suggested means other groups with responsibilities for consumer protection could employ to better discharge this function. The most specific and comprehensive set of recommendations were made by the seminar on institutional responses at the Second National Conference on Consumer Protection in Postsecondary Education (ECS, 1975), which called for truth in advertising, an institutional code of ethics, the passage of ECS Model Legislation, better student orientation, improved information disclosure to prospective students, and functional student grievance procedures, with the right of appeal.

As previously discussed, institutions could do much to aid in protecting consumers through disclosures. Olson (1974) suggested each one should publish a central disclosure document which references additional information kept in a central location to which the public has access. In addition, FICE (1975) and Stark (1975) suggested dissemination of a document informing students of their rights and responsibilities. Finally, it was noted (by Nelson in ECS, 1974a; ECS, 1975; and Stark, 1975) that clearly written contracts between institutions and students which specify the services to be provided and exact charges would aid in consumer protection.

Accrediting agencies. Accrediting agencies have been repeatedly criticized for failure to protect the student's interests and for inadequately evaluating the quality of education or training offered at member institutions (e.g., Orlans, et al., 1974). These criticisms may not be entirely fair, given the interests accrediting agencies represent, their major goal of helping institutions improve in achieving the institution's own objectives, their lack of resources, and their unwillingness to serve as policemen. It has also been suggested that the consumer protection aspects of accreditation could be improved by the participation of a wider range of public representatives in agency decisions (Herrell, 1974; and Report on Higher Education, 1971). This suggestion has been included in USOE's new criteria for recognition of accrediting agencies (AIES, 1975a).

States. Strengthening states' licensing or approval and enforcement capabilities is a popular theme in improving postsecondary education consumer protection. Since states have the major responsibility for governing postsecondary education, consumer protection would be advanced significantly if they could perform their functions better (NACEPD, 1975).

The Education Commission of the States' (ECS) Model State Legislation suggests criteria an institution must meet in order to operate and continue operation, and contains procedures for investigating institutions and revoking their licenses if they fail to meet the criteria. It also requires agents of institutions to obtain permits. These permits may be withdrawn if the rules set forth in the legislation are violated. Violations may also result in civil or criminal penalties (ECS,1973).

The FICE Subcommittee on Educational Consumer Protection (1975) recommended that ECS and the National Association of State Administrators and Supervisors of Private Schools assist "those states which do not have 'approval' legislation, or which are interested in streamlining...existing legislation...[to adopt]...legislation at least as strong and proconsumer as the Model Legislation." (p. 55)

However, Clark (1975) felt that licensing as it is now conceived is too simple a procedure with too many loopholes. He suggested that the states concentrate on better approval procedures and enforcement capabilities to eliminate fraud and deceptive practices.

Bell (1974) also stressed the need for better state enforcement in his testimony before the Federal Trade Commission. In a statement which presented USOE's efforts to strengthen the state approval process he noted that "... the issues that confront us today include not only the development of regulatory laws, but also how such laws are administered and enforced." (p. 7)

Federal government. The role of the federal government in consumer protection has been extensively discussed. Most of the suggestions for improving the federal role in consumer protection concerned improving regulation, making better rules and establishing effective enforcement mechanisms with regard to institutional eligibility for federal financial assistance.

The Eligibility Task Force of the Institute for Educational Leadership (1975) proposed four conceptual models for alternative eligibility systems: (a) a disclosure system separated from accreditation and based on comparable institutional information; (b) a state approval system; (c) a private approval system based on accreditation decisions; and (d) a universal system in which all state licensed institutions are eligible and a federal office assumes authority for limiting, suspending, or terminating eligibility on the bases of complaints and other information. It also organized solutions to eligibility questions into eleven categories. These range from minor modifications of the present tripartite system, through increased state agency responsibility, to total federal responsibility discharged by a separate national commission or the Commissioner of Education using truth in advertising requirements or Federal Trade Commission or Securities and Exchange Commission type authority.

The tripartite system. Of the literature reviewed for this project, only The Second Newman Report (1973) recommended outright abandonment of the current tripartite system for determining eligibility for federal funds. It proposed that eligibility be separated from accreditation and be based on institutional disclosure and "an administrative judgment that an institution has the capacity to perform its stated mission." (p. 108) Other sources proposed alterations in the current tripartite system to deal with specific problems.

A major theme in the literature was giving states more responsibility in the eligibility determination process. This is consistent with their basic responsibilities for governing education and with the recommendations presented earlier to upgrade states' licensing and enforcement capabilities. Providing technical assistance and training to states to help them upgrade their capabilities in eligibility determination was widely recommended (e.g., NACEPD, 1975; FICE, 1975; Pinkham, 1975; Orlans, et al., 1974; and Bell, 1975).

The accrediting agencies' role in eligibility determination was a serious issue in improving educational consumer protection. Concerns revolved around the basic issue of relying on accrediting agencies for quality decisions. Orlans, et al. (1974) stated the problem very directly. "The common belief that regional accreditation is an assurance of institutional quality or even excellence cannot be sustained." (p. 253) If this is the case, then a major assumption about the tripartite eligibility system's function in consumer protection (that only quality institutions attain accreditation) is false.

Three types of solutions to this issue in eligibility determination as it relates to consumer protection were proposed. The first was reducing reliance on accreditation decisions. This theme parallels calls for assigning more responsibility to the states. The second type of solution was slowly improving the accreditation process so it could serve as a more effective indicator of institutional quality in eligibility determinations. This has been USOE's stance. The third type of proposal concerned regulating accrediting agencies more strongly to demand that they meet the expectations of eligibility. This theme is best represented in the proposed Postsecondary Education Consumer Protection Act of 1975 (H. R. 2786 introduced by Representatives Bell and Pettis, 1975).

Another body of suggestions for improving the eligibility system concerned changing the requirements institutions must meet to become eligible. Many suggestions for mandating disclosure were made. The Terms of Agreement required of schools participating in the Guaranteed Student Loan Program is an example of this. The form requires that the chief executive officer insure that his or her institution complies with the laws and regulations of the Higher Education Act, including distribution of required information to students. Proposed disclosure requirements for eligibility most often concern occupational courses and deal with providing information on dropout, completion and placement rates, and refund policies (e.g., FICE, 1975; Pugsley & Hardman, 1975; U.S. Congress, 1975; and FTC, 1975).

Monitoring, enforcement, and termination of eligibility. The above discussion of the eligibility determination system introduces other recommendations for improving the system through monitoring, enforcement, and withdrawal of eligibility. The First Consumer Protection Conference (ECS, 1974b) accompanied the recommendation cited earlier (that states establish consumer protection safeguards) with the suggestions that USOE consider withdrawing funds from those schools that fail to comply with the safeguards. Suggestions that eligibility be tied to disclosure are usually accompanied by provisions for restricting or withdrawing eligibility if information is inaccurate or not forthcoming (e.g., ECS, 1975; and Millard, 1975). The new regulations that require Terms of Agreement for participation in the GSL Program (DHEW, 1975) also include provisions for limitation, suspension, or termination of eligibility. Pinkham (1975) suggests that "the administration of the eligibility portions of federal programs in education should be coordinated by one agency with authority to restrict or terminate eligibility." (p. 2) He believes DEAE should be entrusted with this responsibility and given a boost in status and statutory authority to handle it. He further recommends that the "Advisory Committee on Accreditation and Institutional Eligibility must... design and implement a system covering the full extent of determining, monitoring, and terminating eligibility." (p. 4)

Improved coordination and communication. The preceding pages have discussed ways in which institutions, the accreditation agencies, the states, and the federal assistance programs could improve their consumer protection functions in postsecondary education. Many observers have noted that a major improvement in the consumer protection system could be brought about simply by providing greater coordination and communication among them. Kaplin (1975) believes "the immediate goals should be: increased understanding of each element's capabilities; sharper emphasis on each element's strong points; clearer definition of each element's function; and better division, coordination, and interrelationship of functions.... Each element should adopt procedures for sharing information with one another of adverse determinations against institutions or programs engaging in consumer abuse." (pp. 26-29) The FICE (1975) report recommended that assistance and guidance should be provided to encourage the exchange of information between organizations concerned with consumer protection in education.

Bell (1975) recommended a central consumer protection clearinghouse that "...would provide for sharing of information with groups such as regulatory agencies, accrediting associations, state-wide coordinating agencies and federal agencies..." (p. 3) The purpose of this clearinghouse is somewhat different from the other types of clearinghouses mentioned previously (e.g., one for information on student complaints and one serving as a data bank on institutional information). Although it is possible and was suggested (e.g., ECS, 1974b) that one clearinghouse serve multiple purposes, the unique function of the clearinghouse recommended here is the exchange of regulatory information or information on an institution's abusive practices. As Pugsley and Hardman (1975) and Orlans, et al. (1974) note, such information exchange could serve as an "early warning" system to alert regulatory bodies to emerging problems.

Literature Summary

The body of literature which has been reviewed and synthesized may be briefly characterized by several observations. First, there is a wealth of "expert opinion" about (a) the nature of consumer protection needs in postsecondary education and (b) possible improvement mechanisms. But there is almost no empirical evidence to suggest the actual extent of presumed institutional abuses or the degree to which consumers themselves perceive various institutional practices to be abusive. Congressional and regulatory commission hearings, media exposés, and scandals about high loan default rates provide interesting case studies and circumstantial evidence but very little comprehensive data.

Second, government regulatory bodies have an understandable tendency to either ignore the importance of institutional eligibility limitation and suspension decisions (focusing instead on the less thorny eligibility determination area) or to suggest that these decisions are really the responsibility of some other agency. This is especially the case with regard to the imposed role of non-governmental accrediting agencies. The entire area of regulatory agency monitoring, enforcement, and termination, without which there can be no serious redress or regulatory intervention on behalf of consumers, is characterized by buck passing. Recently cases of blatant and self-admitted consumer abuse and fraud have been allowed to persist for months because no single party in the tripartite eligibility system was able (or willing?) to step in and suspend the eligibility of the schools concerned. Regulatory approaches are further threatened by a growing and politically powerful national reaction against sprawling and insensitive governmental guidelines, reporting requirements, and red tape.

Third, there is very limited sensitivity to the fact that education is a specialized, intangible service that may not be susceptible to traditional, marketplace consumer protection devices. Millard (in ECS, 1974b) was one sensitive and eloquent exception.

> There is very clearly a difference between the student as a person and consumer in relation to General Motors or Post Toasties. The student's relation to his education is a much more complex relationship. The student himself is involved in a unique way in the process of his education. He is not only consumer, he is participant, and he is product.... This does not in any way denigrate consumer protection in postsecondary education, but it does involve the recognitiion that the problem we are dealing with, while an essential problem, does have to be related to the other aspects of personality, other aspects of life involvement. (p. 11)

Fourth, the informed-consumer approach to educational consumer protection suffers from a dangerously narrow fixation with "providing consumers with better information." This fixation usually manifests itself in: (a) extensive lists of things individuals "ought to know in making better postsecondary education decisions"; (b) various kinds of clearinghouses and mechanisms to serve as central repositories and distribution channels for masses of descriptive institutional data; and (c) invariably, calls for improved guidance and counseling in the secondary schools. All of these things are no doubt needed. But the potential for immediate major impact would seem to be in (a) separating the more narrow consumer protection interests from those of educational and career decision making in general and (b) identifying a very limited set of things individuals ought to know and be able to do to avoid or deal properly with abusive institutional practices.

Finally, there is limited recognition of the growing popular awareness that the powers of government are not limitless; it is not possible to protect citizens from all possible social evils. Citizens must invest some of their own time and effort to promote their own welfare; government must, however, insure that the opportunities for these investments are available to all.

METHOD

Development and Pilot Test of Instruments and Analysis Procedures

The Primary Elements of Educational Consumer Protection

Which institutional conditions and practices can mislead students and frustrate even their well-made decisions?

Our first task in defining the primary elements of consumer protection in postsecondary education was to build a taxonomy of situations for which there could be general agreement that "this is clearly abusive." A two-stage 20% random sample (see Table 2) of complaints was selected from the DEAE student complaint file at USOE (see Behr & Babington, 1974). Each complaint which contained some documentation was studied to identify:

- the exact nature of the student's complaint;
- its antecedent conditions (i.e., its cause, in terms of precipitating conditions admittedly existing in the school);
- the resolution, if any; and
- ways in which the student might have best avoided the situation.

Table 2

SAMPLE FROM DEAE STUDENT COMPLAINT FILE

Year	Entire File	Percent of File	Original Sample	Percent of Sample	Final Augmented Sample	Percent
1969	10	2%	1	1%	2	2%
1970	60	10%	12	15%	18	16%
1971	106	17%	19	23%	25	22%
1972	161	26%	25	31%	30	26%
1973	154	24%	16	20%	23	20%
1 Jan - 1 July 1974	43	7%	4	5%	5	4%
1 July 1974 - 1 July 1975	96	15%	4	5%	12	10%
TOTAL	630	101%[1]	81	100%	115	100%

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[1] Does not total 100% because of rounding.

Appendix A presents examples of abuses derived from 242 such "incidents" extracted from the sample of 115 student complaints. These examples were augmented by a similar analysis of a sample of student complaints drawn from the consumer complaint files of the Federal Trade Commission and the previously summarized literature search (see also Helliwell & Jung, 1975). Additional examples of perceived abuse were discovered which dealt primarily with lack of school financial stability. These examples concerned cases where schools had closed without warning, leaving students with unpaid loans and no recourse for obtaining the educational services for which they had paid. All examples, when grouped, yielded the 14 initial categories listed previously in Table 1 (page 3).

Using analysis of the antecedent conditions (causes) which appeared to lead to the various examples of student abuses listed in Appendix A, we produced a revised set of "potentially abusive institutional policies and practices." This set, along with selected examples which were judged to be fairly typical, is presented in Appendix B; it served as our basic guide in the development of indicators of abusive institutional practices.

There are no doubt other potentially abusive institutional practices, and in the course of our study we discovered many of them. The ones listed in Appendix B were chosen because they represented, in our judgment, the set that was most dangerous to students receiving federal aid and most easily detectable without recourse to: (a) excessive subjectivity (e.g., without attempting to define and measure "poor moral character of administrators"), or (b) excessive expense (e.g., without requiring schools to carry out costly data collection and tabulation efforts on "training-related" job success of graduates or buy costly performance or surety bonds).

The nature of the universe of complaints and documents with which we had to work provided one major bias which must be made explicit at this time. All of the consumer complaints we examined at DEAE and most of the consumer protection literature involved non-public occupational training institutions. However, our work in identifying the institutional abuses listed in Appendix B led us to conclude that the practices reported therein do not occur solely in occupational training institutions but also occur to some extent in institutions of higher education. It was concluded that the nature of private occupational training, the contractual implication of learning a specified "skill" for a specified amount of money, contributes to an atmosphere in which the student is more likely to perceive abuse.

The zeitgeist of media exposés on "predatory" occupational training schools supports this atmosphere. Conversely, the unspecified (perhaps unspecifiable) nature of higher education's goals makes it extremely unlikely that "victims" of abusive practices will perceive a sound justification for complaining or will actually render a formal complaint, even if they do perceive justification. Paradoxically, the academic freedom which is so important for preserving the independence of intellectual inquiry in higher education makes it possible that abusive practices may go unexamined and may be perpetuated longer than in the area of occupational training.

Indicators of Abusive Practices

Indicators are tabulations or derived numbers which can be used to periodically gauge the direction and magnitude of complex processes. While there rarely is a one-to-one correspondence between indicators and the underlying processes they are intended to represent, indicators nevertheless afford convenient opportunities to assess events and provide useful insights into what is happening over time. Indicators may be conceptualized along a dimension of correspondence with reality, ranging from close correspondence (e.g., number of freight car loadings) to slight correspondence (e.g., Index of Gross National Product). Experience with economic and social indicators has shown that the further away an indicator progresses from the underlying events it describes, the more difficult it is to collect and interpret--to use in making decisions. A long history of standardization and empirical validation is often required in order to interpret indirect indicators, while direct indicators can be used more rapidly, collected and interpreted, on the basis of their correspondence with reality.

In the present case, indicators were desired which could help a large number of interested parties make judgments about a concept known as "consumer abuse." It was apparent that the concept was multi-dimensional and that potential indicators could vary greatly in directness, or the degree to which they corresponded with reality in postsecondary institutions. Our analysis of the types of decisions to be facilitated by consumer protection indicators, for both the regulatory and non-regulatory approaches, led us to believe that more direct indicators, such as the frequency with which a certain abusive practice occurs in an institution, would be more useful than indirect indicators, such as an institution's "dropout" rate, "placement" rate, etc. These indirect indicators, because of their tendency to react to multiple sources of causation, are highly susceptible to misinterpretation. More seriously, comparisons between or among institutions based on such indicators may be easily influenced by factors which are beyond the power of an institution to control, such as entering student ability, labor market fluctuations, previous student employment history, etc. All are also very difficult to collect and report in any standardized manner, so that comparisons among self-reported institutional "rates" for consumer protection purposes could be biased by large methodological variance.

It was therefore decided that primary attention in this project would be paid to indicators which constituted direct, descriptive information subject to relatively clear interpretation by potential recipients and suppliers alike. Indirect indicators were formulated and collected to the extent feasible, so that the time-consuming steps of standardization and empirical validation could be at least initiated during the present project. The specific indicators and data analysis procedures which were developed are discussed later in this section.

Data Collection Mechanisms

The most desirable mechanisms for obtaining indicators are those which provide accurate data without imposing a new reporting burden; they result from new analyses and reporting of already collected data. We performed a search to determine whether data on potentially abusive school practices (see Appendix B) sufficient for consumer protection utilization are currently available.

Some higher education experts suggested that data from already existing federal data collection mechanisms, such as the Higher Education General Information Survey (HEGIS) and the Vocational School Survey, both conducted by the National Center for Educational Statistics (NCES), could be used to provide consumer protection indicators. Ignoring the possible inaccuracy and long publication lag time[1] of the HEGIS and the Vocational School Survey, it is clear that these data, as published in NCES's Education Directory and Schools for Careers, are not of the "consumer protection" type as defined earlier (they are more of the "better information for decision making" type).

Currently the USOE student assistance programs also gather some form of data from participating institutions. These data are defined as those necessary for the "adequate administration" of the program. They basically concern the numbers and characteristics of enrolled students, amounts of financial aid awarded, etc. Even though data on potentially abusive school practices could theoretically be required under the "adequate administration" clause, our searches revealed that no USOE programs collect such data at the present time.

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[1] HEGIS data generally are published one to three years after their collection; Vocational School Survey data have had a three to four year delay between collection and publication.

An example of potentially relevant data which are currently collected would be those obtained by some private accrediting teams during institutional site visits, especially ratings of program and faculty quality. However, it seemed clear to us that the publication of these confidential ratings, even if it could somehow be mandated, would lower their value for their primary purpose, which is institutional self-study and improvement. Lack of recency was also a major problem, since accreditation site visits occur only twice every decade, on the average.

As another example, the audited fiscal reports on an institution's financial condition, submitted yearly to accreditation bodies and to some state approval agencies, probably contain relevant clues to the existence of consumer abuses, especially in the area of financial stability. We made contacts with organizations such as the National Association of College and University Business Officers, the American Institute of Certified Public Accountants, and the National Center for Higher Education Management Systems in hopes of identifying direct indices of an institution's financial health which could be derived from these fiscal reports. These contacts yielded several helpful suggestions but no definitive techniques for deriving direct indicators of a postsecondary institution's financial stability.

College and school catalogs also seemed to have potential as a data source, because almost every institution publishes an up-to-date, detailed catalog describing its offerings, facilities, and operational practices. For all indicators we initially identified, we made an attempt to determine whether they could be obtained from a simple analysis of school catalogs or other public information documents. In general, the indicators we judged to be most important were not included in catalogs or other documents.

Our preliminary observations, which were only partially supported later by actual data, thus led us to the conclusion that existing data collection mechanisms and sources were inadequate to provide indicators that were descriptive of the institutional characteristics, policies, and practices which related directly to student consumer abuse. Therefore, we decided that some new data collection mechanism was needed to provide information sufficient for the consumer protection approaches we had identified.

The Institutional Report Forms (IRF's)

Two Institutional Report Forms (IRF's) were drafted to serve as the basic data collection instruments of the regulatory approach. The forms were based on the policies and practices contained in Appendix B. One form contained items appropriate for occupational training institutions and the other for degree granting institutions of higher education. The 13 categories of items included in the original draft IRF's are listed in Table 3. In all cases, items were written keeping in mind the critical data requirements listed on page 5. A "yes/no/not applicable" item format was adopted for all items where it was feasible (53 out of 55 on the first draft IRF for occupational schools). The preliminary IRF's were designed to be optically-scanned self-report questionnaires which could easily be filled out by institutional staff and returned to a central processing facility for machine scoring and rapid data reduction and processing. The self-report feature was controversial, in that it offered administrators the opportunity to intentionally misrepresent their school's policies and practices; it thus required (a) mechanisms for auditing forms and (b) penalities for misrepresentations discovered by audits. Some commentators on the draft IRF's claimed that honest responses could never be obtained, and that the IRF's would "make liars out of honest people." We disagreed, contending that: (a) no institution was expected to be perfect (i.e., have no potential abuses at all); (b) even misrepresentations would have the effect of causing administrators to review their policies and perhaps change them in a pro-consumer direction; and (c) an efficient auditing mechanism could be developed, using reviews of an institution's IRF responses by officials of peer institutions and the tripartite eligibility system who have personal knowledge of the institution.

Other commentators worried that the yes/no item format was really too simple for measuring such a complex concept as potential for student abuse. Again, we disagreed. We felt we had identified a good basic set of potentially abusive policies and practices. The items were designed simply to find out whether or not those policies and practices existed at an institution; they were quite straightforward, requiring no unreasonably complex judgments or obtrusive data collection efforts. We felt we had a strong rationale for each item we included in the original draft IRF's (see Jung, et al., 1975).

Table 3

TOPICS INCLUDED IN ORIGINAL DRAFTS OF INSTITUTIONAL REPORT FORMS

1. Refund Policies and Practices
2. Recruiting and Admissions Practices
3. Instructional Programs[1]
4. Instructional Staff
5. Disclosure in Written Documents
6. Student Selection and Orientation
7. Instructional Equipment and Facilities[1]
8. Job Placement Services and Follow-Through
9. Advertising Practices[1]
10. Recordkeeping Practices
11. Stability of Instructional Staff
12. Representation of Chartered, Approved, or Accredited Status
13. Financial Stability

The Enrolled Student Questionnaire (ESQ)

One additional data collection form for the regulatory approach was drafted to obtain the perceptions of enrolled students about the potential abuses described in Appendix B. The originally intended purpose of the ESQ was to gather a broad range of data roughly parallel to the IRF data, with categories similar to the 13 IRF topics listed in Table 3. A multiple-choice item format was adopted, and a procedure for questionnaire administration was developed using independently controlled in-class marking by first year students in target institutions. First year students were selected because it was felt that (a) all institutions, even occupational training institutions with one-year programs, would have "first year" students, and (b) first year students would have better knowledge about the institution's advertising, recruiting, admissions, disclosure, and orientation practices. In-class marking was selected because it would avoid the problems caused by non-response to a mailed survey. The administration procedure was independently controlled to avoid the possibility of data contamination by potentially self-serving school administrators. As will be described later, however, these administration procedures were modified.

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[1] not included in IRF for degree granting institutions

Instrument Pretest

The original draft instruments (two IRF's and ESQ) were pretested in seven schools in Santa Clara County, California. The files of the State Bureau of School Approvals in Sacramento, California, were examined to identify all the currently approved schools in Santa Clara County. A stratified random sampling procedure was used to select one school (and one backup school) from each of the following categories of institutions: public four-year, private four-year, public two-year and private two-year. Two schools (and two backups) were selected at random from each of the following categories: not-for-profit vocational-technical, and proprietary vocational-technical. All schools selected agreed to participate in the pretest with the exception of the original and backup schools representing the private four-year category, namely, the University of Santa Clara and the Northern California Bible College. The pretest instruments were tailored to the specific type of school(s) in each cell. Pretesting consisted of individual interviews with school personnel and enrolled students (no more than eight per institution) to solicit their responses to and then their subjective judgments about the feasibility and utility of each IRF/ESQ item. Table 4 on the next page shows the schools which participated by category, along with the number of staff and students interviewed and the dates the interviews took place. The responses from the pretest (and copies of the three original draft instruments) are summarized in AIR's supporting submission to the Office of Management and Budget (AIR, 1976) and are not reprinted in this report. In general, participants in the pretest interviews had few problems with the instruments. Utilizing these results and the comments of the USOE/OPBE Project Monitor and the Advisory Panelists listed in Appendix L, AIR staff completed revisions of the project instruments and prepared for their field testing. The titles of some topics were changed and their ordering was modified to better reflect a logical assessment sequence. The 13 topics in the final draft IRF's are listed in Table 5.

Table 4

SCHOOLS PARTICIPATING IN INSTRUMENT PRETEST

Public four-year degree granting	Private four-year degree granting
San Jose State University (5 staff, 3 students; 4 December 1975)	none (see explanation on page 37)
Public two-year degree granting	Private two-year degree granting
San Jose City College (6 staff, 6 students; 2 December 1975)	O'Connor Hospital School of Radiologic Technology (2 staff, 8 students; 5 December 1975)
Not-for-profit vocational-technical	Proprietary vocational-technical
Adult Educational School Los Gatos, CA. (1 staff, no students; 9 December 1975)	Bay Valley Technical Institute (1 staff, 8 students; 24 November and 15 December 1975)
Santa Clara Valley Medical Center School of Radiologic Technology (1 staff, 5 students; 5 December 1975)	John Robert Powers School (2 staff, 8 students; 25 November 1975)

Table 5

TOPICS INCLUDED IN FINAL DRAFTS
OF INSTITUTIONAL REPORT FORMS

1. Refund Policies and Practices
2. Advertising Practices
3. Admission Practices
4. Instructional Staff
5. Disclosure in Written Documents
6. Student Orientation
7. Job Placement Services and Follow-Through
8. Recordkeeping Practices
9. Stability of Instructional Staff
10. Representation of Chartered, Approved, or Accredited Status
11. Financial Stability
12. Instructional Programs[1]
13. Instructional Equipment and Facilities[1]

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[1] not included in IRF for degree granting institutions

Scoring, Weighting, and Analysis Procedures for Final Draft Instruments

For the optical scanning and scoring of the IRF's and ESQ, file formatting instructions and logical flow/editing rules were constructed. These specifications were of importance mainly to National Computer Systems (NCS), which was to perform the scoring and data translation operations. Item weights were then developed for each item on the instruments (except the descriptive items on the ESQ). The item weights were designed to be applied to the raw item responses, yielding derived scores for each item, which could then be summed and averaged for each topic. This allowed calculation of 13 topic scores for the occupational IRF, 11 for the degree granting IRF, and 11 for the ESQ. These topic scores for each institution could then be averaged to produce an aggregate institution score.

The weighting was designed so that the measured presence of a potential abuse caused a positive increment to the derived scores. Each topic and institution score could thus vary from zero (no abuses detected) upward (points added for each abuse detected). The preliminary IRF and ESQ item weights were based on the best judgments of AIR staff regarding: (a) relative importance of each item; (b) raw score variance expected to be obtained in the field test; and (c) relative importance of each topic. These initial weights were also examined by the project's advisory panelists and revised according to their comments. The preliminary scoring and weighting procedures are contained in a document by that name (Jung, 1976) and are not reprinted in this report.

Field Test of the Information Collection and Analysis Mechanisms

A small scale field test of the final draft Institutional Report Forms (IRF's), the Enrolled Student Questionnaire (ESQ), and their associated processing and weighting procedures was carried out to estimate their overall practicality and utility for use with the regulatory approach to improving educational consumer protection. In this field test, we attempted to gather preliminary normative data for the various derived scores, and to estimate the validity and reliability of these scores for potential wider use by regulatory agencies at all three levels of the tripartite eligibility system previously outlined. As already indicated, the contemplated uses included institutional self-improvement, an "early warning" system for school regulatory agencies at state and federal levels, and the basis of a formal communication system among tripartite agencies.

Changes Suggested by Advisory Panels

The ESQ was designed to collect comparable data from students on the consumer abuse dimensions included in the IRF's. It was also designed to be administered to intact classes of students attending the institutions in the field test. During their February 1976 meeting, members of the Research Advisory Panel suggested that the ESQ should not be used primarily to confirm the accuracy of the IRF responses, but rather as a vehicle to determine whether or not students perceive dissatisfaction at institutions whose IRF scores reveal a higher potential for abuse. They felt that students were not in a particularly good position to have first hand knowledge about a number of the institutional policies and practices asked about in the draft ESQ. The panelists also suggested that a larger number of institutions might agree to participate in the voluntary field test if participation did not involve disruption of classes for the administration of the ESQ. We accepted the wisdom of these recommendations, rewrote the ESQ, and redesigned the planned administration procedures. The number of ESQ topics was reduced from 11 to 10, and the number of items from 36 to 29; three items were added on overall student satisfaction and general knowledge of consumer rights. Plans were changed from on-site personal administration to mailed administration with an intensive survey of 10 percent of the non-respondents. This required only that participating institutions provide us with a list of the names and addresses of their first year students.

Changes Required by the Office of Management and Budget

The IRF's were designed as optically-scanned, self-report questionnaires, to be completed and certified as accurate by institutional administrators themselves. We were required to obtain forms clearance from the Office of Management and Budget (OMB) prior to the field test of the self-report IRF's. OMB officials decided that honest responses to some of the IRF items could be held as self-incriminating; they therefore refused to grant clearance for the field test of the IRF's. To salvage some partial test of the primary data collection mechanisms of this project, we agreed to their suggestion that we modify the final draft IRF's into interview guides. The rationale was that incriminating responses completed by an outside interviewer/observer would at least not be self-incriminating, and that the outside party, if expert, would be able to exercise independent judgment to take into account idiosyncracies in the policies and practices of individual institutions which might not fit into the yes/no format of the IRF items. The IRF's which were field tested, therefore, required an on-site interview with institutional administrators and an examination by the interviewer of certain institutional policy statements, records, and public disclosure documents. In view of the fact that the interview format required by OMB was not efficient for large-scale administration of the IRF's (i.e., for applications requiring the annual administration of more than a few hundred IRF's), we also decided to drop the plan to make them machine-scorable. The optical scanning system under development by NCS was cancelled. OMB required no changes in the ESQ. The field-tested IRF Interview Guides and ESQ are reproduced in Appendices G and H to this report.

Field Test Samples

We were interested in inferring from the results of the field test the probable results of large-scale implementation of the information collection, processing, and weighting system. In carrying out such a field test, it was essential to select institutions which were broadly representative of the institutions for which implementation was being considered. This meant identifying a sample of institutions which could be predicted to obtain both relatively good and relatively poor scores on the IRF. Budget constraints dictated that this sample could not exceed approximately 50 institutions. Strict random sampling procedures were not used because of the low probability that a random sample of this size would contain sufficient numbers of institutions on the extremes of the predicted consumer abuse score distributions. Therefore, it was decided to sample 15 schools from each of three states selected on the basis of the stringency of (a) their laws governing the licensing and operation of private postsecondary institutions and (b) their enforcement of those laws. Prior to the selection of the three states, four experts were consulted by telephone to obtain their nominations of five states whose laws were not stringent, five whose laws were moderately stringent, and five whose laws were very stringent. These persons were:

Dr. Jack Leslie and Dr. Robert Van Tries from AIR's State Agency Advisory Panel; Dr. Joseph Clark, Commissioner of the Indiana Private School Accrediting Commission; and Mr. James R. Manning, President of the National Association of State Administrators and Supervisors of Private Schools. The states selected by category were: Missouri, not stringent; California, moderately stringent; and Minnesota, very stringent. Within each state, a nine cell sampling frame was established with three levels of strata for (a) ownership status (public, private non-profit, and private proprietary) and (b) school type (four-year, two-year, and occupational). Because of their preponderance in the actual population of postsecondary institutions, there were two replications per cell for two-year degree granting and non-degree occupational institutions, resulting in a final sample size of 15 institutions per state, or 45 institutions in all. The sample for each state is depicted graphically in Figure 1.

		Institution Type			
		4-year degree granting	2-year degree granting	non-degree occupational	
Ownership Status	public	1	2	2	5
	private non-profit	1	2	2	5
	private proprietary	1	2	2	5
		3	6	6	15

Figure 1: Number of Postsecondary Institutions Planned Per State in Field Test Sample (3 States)

Since interviews of school staff were required instead of the originally planned self-report administration, sampling was restricted to the two largest urban areas in each state to reduce travel costs and time. Through contacts with state agency personnel in each state, the following numbers of postsecondary institutions were identified as "state approved" in each of the six designated urban areas, a total of 475 institutions in all:

- Missouri: 51 schools in Kansas City, 70 in St. Louis, for a total of 121 institutions;
- California: 160 in Los Angeles, 86 in San Francisco, for a total of 246 institutions; and
- Minnesota: 72 in Minneapolis, 36 in St. Paul, for a total of 108 institutions.

These institutions were assigned to the most appropriate cell in the sampling frame based on the limited amount of information available to us regarding their type and ownership status. Depending on the intended sample size in each cell, one primary institution and one backup institution or two primary and two backups were selected using a table of random numbers. Appendix C contains the names of the 45 primary and 45 backup institutions selected to participate in the field test.

Institutional Contacts

To secure the voluntary participation of the 45 selected institutions, the chief administrators of the schools were contacted first by letter and then by telephone to follow up on the initial mail contact. In the contact letter and call, AIR staff explained the nature of the field test, the minimal time requirements (e.g., for participating in the IRF interview and supplying student name and address lists), and the potential advantages to the school of participating (e.g., feedback of the ESQ responses from their enrolled students). Each school contact person was offered an honorarium of $50 for assisting with the field test; we also stressed that all expenses associated with preparing the list of student names and addresses would be reimbursed. A copy of the institutional contact letter is appended as Appendix E.

As a result of the initial letters and phone calls, seven primary schools were declared ineligible to participate because they had closed or no longer offered postsecondary programs. The administrators of ten more primary schools refused to participate, citing lack of time or interest. Appendix C contains the names of the seven ineligible schools and the ten schools whose officers refused to participate in the survey, along with a brief explanation of the reason for ineligibility or refusal. Designated backup institutions were contacted for each of the 17 schools. Of these 17 backup institutions, four were declared ineligible to participate for reasons similar to those mentioned above. These four are also listed in Appendix C. This left a final "effective" sample of 41 institutions for which an interview time was scheduled and confirmed by a letter from AIR.

Between the time interviews were scheduled and the time they were actually carried out, four additional schools (listed in Appendix C) refused to participate in the study and officials of five schools referred us to their corporate headquarters for the interviews. This left a final set of

37 institutions which volunteered to participate in the field test: 32 actual schools and five corporate headquarters. These 37 institutions are listed in Appendix D, along with the name of a designated contact person in each school or corporation; the characteristics of the institutions in terms of the original sampling plan are depicted in Figure 2.

		Institution Type			
		4-year degree	2-year degree	non-degree occupational	
Ownership Status	public	Mo: 1 Ca: 0 Mn: 1	Mo: 0 Ca: 0 Mn: 1	Mo: 1 Ca: 2 Mn: 1	7
	private non-profit	Mo: 2 Ca: 1 Mn: 2	Mo: 0 Ca: 0 Mn: 1	Mo: 4 Ca: 3 Mn: 3	16
	private proprietary	Mo: 0 Ca: 0 Mn: 0	Mo: 1 Ca: 0 Mn: 2	Mo: 3 Ca: 5 Mn: 3	14
		7	5	25	37

Figure 2: Number of Postsecondary Institutions Actually Participating in Field Test

The difference between the planned characteristics of the field test sample and the actual characteristics are due almost entirely to the fact that: (a) we could find no proprietary 4-year degree granting schools and (b) hospital schools of allied medical technology which were assumed, on the basis of information available to us at the time of sample selection, to be 2-year degree granting did not award associate degrees. We do not feel that these differences significantly affected the representativeness of the field test sample.

Four experienced AIR staff members were trained on the content of the IRF Interview Guides (Appendix G) and on standardized interviewing and marking techniques. These staff then personally visited each of the 37 institutions or corporate headquarters listed in Appendix D. Chief administrative officers, or groups of officers, were interviewed and catalogs, brochures, and other public information documents, advertising, and policy statements were examined. Interviews averaged about one and one-half hours in length. In most cases, two separate IRF's were completed; one was based on the interviewer's examination of the institution's publicly-available documents and the other was based on all documents plus responses obtained during the interview. This dual procedure was followed to allow estimation of the degree to which IRF data could be obtained via a simple document review process, which would not require any time for interviewing institution staff. In four schools two interviewers were assigned to complete IRF's independently in an attempt to estimate the reliability of the guides.

Following the interviews, the AIR staff person attempted to make arrangements to obtain the student name and address lists for the ESQ field test.

Data Preparation (IRF)

Editing, coding, and verification of data. The completed IRF Interview Guides were returned directly to AIR for editing, coding, and verification of the data. A manual editing procedure was used to clean the data so that any errors in the completion of the forms were corrected (e.g., multiple responses to single response items, or failure to follow branching instructions). The edited data were then manually entered onto coding sheets. After a visual verification check of the coding (one person read the coded data and a second person verified the responses on the IRF form), the IRF data were entered onto disk storage from the coding sheets via a remote computer terminal.

Once all IRF data were processed and entered onto disk, a printout of the data was obtained and checked visually against the coding sheets used to enter the data. Any errors in the IRF data stored on disk were then corrected, using text editor commands. A range check of the raw IRF data values was performed using a computer procedure from the Statistical Package for the Social Sciences (SPSS). The four data values that were acceptable are given below:

0 = "no" response was marked
1 = "yes" response was marked
8 = all responses for a given item were skipped, as per the instructions on the form
9 = all responses for a given item were omitted

No out-of-range values were found. The data were then stored on magnetic tape.

Weighting. The merged IRF data were used as input to a tested and validated computer program designed to weight the IRF raw data so that 13 topic scores and one institution score were produced. For split-half reliability analysis, the data were also divided into "even-odd" items and an "even" and an "odd" set of 13 topic scores and one institution score were also created as part of this program's execution. The weighted data were then written onto magnetic tape and made ready for analysis.

The IRF coding, editing, and weighting specifications used in the field test are presented in detail in Appendix I. Documentation and listings of computer program IWEIGHT have been submitted separately to USOE as required by our contract.

ESQ Mailing and Follow-Up

Twenty-six institutions were able to supply us with the names and addresses of all of their first year students, including in most cases, transfer students; 11 institutions were unwilling or unable, because of time constraints, to participate in the ESQ portion of the field test. The participating institutions, indicated in Appendix D, supplied 7825 names and addresses in all: 5659 from eight degree granting institutions and 2166 from 18 smaller non-degree institutions. Names and addresses were coded by AIR and keypunched by NCS, which also arranged to send an ESQ (Appendix H) to each person by first class mail. Along with the ESQ went an initial contact letter (see Appendix F) and a business reply envelope addressed to NCS. Three weeks after the initial mailing, NCS sent a second mailing of the ESQ and a letter (see Appendix F) to 6231 non-respondents--persons who had not yet returned a questionnaire and whose questionnaires had not been returned by the post office as non-deliverable.

Six weeks after the initial mailing, 2879 ESQ's had been returned completed and 413 had been returned as non-deliverable. This represented a response rate of 38.8% of those questionnaires actually delivered. The total non-respondent group numbered 4533; Table 6 presents a summary of the ESQ response rates by school. A 10% special sample of 453 was selected at random from the 4533 non-respondents. AIR staff made an intensive effort to reach each of the persons in this special sample to estimate whether the 2879 respondents were a systematically biased segment of the original field test population of 7825.

Table 6

ESQ FIELD TEST RESPONSE RATES

School Name	N of Students	N not Delivered	N not Responding	N Responding	Adjusted Response Percentage
John Adams Community College Center	1298	160	775	363	31.9%
House of Charm	91	5	64	22	25.6%
Pepperdine University	649	24	367	258	41.3%
Concordia College St. Paul	272	14	113	145	56.2%
Abbott-Northwestern Hospital School of X-Ray Technology	9	1	4	4	50.0%
University of Minnesota School of Radiologic Technology	25	1	11	13	54.2%
Brown Institute	748	37	476	235	33.1%
Trowbridge Beauty College	37	4	21	12	36.4%
Hennepin County Medical Center School of Medical Technology	12	1	3	8	72.7%
Fairview Hospital School of X-Ray Technology	7	0	1	6	85.7%
Minneapolis School of Anesthesia	19	0	2	17	89.5%
Kaiser-Permanente School of Anesthesia for Nurses	8	0	1	7	87.5%
California Hospital School of X-Ray Technology	7	0	4	3	42.9%
Homer G. Phillips Hospital School of Radiologic Technology	11	0	6	5	45.5%
Research Medical Center School of Radiologic Technology	8	0	4	4	50.0%
Maryville College	228	1	115	112	49.3%
Ranken Technical Institute	339	9	237	93	28.2%
St. Louis University	1393	37	765	591	43.6%
Menorah Medical Center School of Radiologic Technology	2	0	1	1	50.0%
Martin Luther King, Jr. General Hospital School of Radiologic Technology	7	0	4	3	42.9%
Minneapolis Drafting School	162	25	107	30	21.9%
Minneapolis Beauty College	67	7	50	10	16.7%
Barnes Hospital School of Anesthesia for Nurses	32	1	20	11	35.5%
University of Missouri at Kansas City	2098	66	1222	810	39.9%
Career Beauty School	50	3	35	12	25.5%
North Central Bible College	246	17	125	104	45.4%
TOTALS	7825	413	4533	2879	38.8%

Using telephone directories, post office forwarding services, assistance operators, the assistance of staff at the field test schools, and the assistance of immediate family members, we were able to locate 342 of the 453 persons in the special sample (75%) and talk to them by telephone. Of these, 302 agreed to complete ESQ's via telephone interview, a final response rate of 66.7%; 28 persons refused to cooperate and 12 reported that they had never attended the school which had reported them as enrollees. When asked why they had not returned the original questionnaires, the majority of the non-respondent group reported they lacked the time (37%) or hadn't received them (35%); 15% gave no reasons and 13% cited other reasons, such as lack of understanding and lack of perceived relevance to them.

Data Preparation (ESQ)

Scanning and editing. The ESQ respondent data were collected on machine scannable versions of the ESQ developed by NCS.[1] These data were processed by NCS, using editing specifications provided by AIR. The scanning and editing were done in one step, using a computer editing program developed by NCS. The data were scored as 0, 1, 8, or 9, as was done for the IRF data (described earlier) and written on a magnetic tape. During the scanning and editing, 34 questionnaires were found to be unprocessable because of marking errors or loss of the ID number portion of the questionnaire by respondents. This left a final number of 2845 respondent ESQ's for processing.

The ESQ non-respondent data were edited, coded, and keytaped by hand at AIR, using techniques similar to those used with the IRF and described previously.

Data verification. The ESQ respondent data tape was sent to AIR for verification of the editing process. Twenty ESQ's were manually edited and coded and the records were visually compared to the records from the NCS tape. Although the NCS editing program had been carefully tested on sample data and corrected earlier, one error in the editing of items was detected. This error was corrected by NCS and an edited ESQ respondent data tape was created by substituting the correct responses for the incorrectly coded responses, using a computer program developed by AIR for that purpose. An SPSS item frequencies program was used to check for out-of-range values in both the respondent and the non-respondent data (values other than 0, 1, 8, or 9). No out of range values were detected in either set. A printout of the respondent item data was generated and mailed to each participating school in accordance with our promise to the administrators in our initial contact letter.

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[1] This machine scannable questionnaire and the scanning and editing programs are included in the NCS documentation package sent separately to USOE.

Check for Respondent Bias

In an attempt to determine whether the non-respondent data were significantly different from the respondent data, indicating a respondent bias, we ran chi-square tests on the item response frequencies for each of 32 ESQ items for which discrete response frequencies could be obtained. We also ran four chi-square tests to compare the characteristics of non-respondents with respondents on enrollment status, attendance status, resident status, and sex. These tests demonstrated significant response differences ($p < .01$) on 16 out of 32 items; in addition, non-respondents were significantly less likely to be still enrolled at the field test institution ($X^2 = 52.90$, $p < .001$, df = 1), less likely to be full-time students ($X^2 = 4.64$, $p < .05$, df = 1), more likely to be classified as residents for tuition purposes ($X^2 = 30.09$, $p < .001$, df = 2), and more likely to be male ($X^2 = 9.95$, $p < .01$, df = 1). Our null assumption that the respondent data represented a non-biased sample from the entire population of 7825 first year students was not supported.

Sample-Weighting Non-Respondent Data

Each cooperating located non-respondent represented 15 non-located non-respondents (4533 ÷ 302). Therefore, each non-respondent case was given a sample weight of 15 and each respondent case was given a sample weight of 1. The 3147 respondent and non-respondent cases (2845 + 302) were then merged onto one data tape.

Weighting All ESQ Data

The merged ESQ data tape was used as input to a tested and validated weighting program designed to produce 10 topic scores and one institution score for each student, analogous to the weighting done for IRF data. If a student failed to answer all questions for a particular topic, his/her topic score was set to a missing data indicator (999999). In addition, the program produced quantitative scores for the consumer items which had been added to the ESQ form. All scores were finally written onto magnetic tape. The ESQ editing and weighting specifications are presented in detail in Appendix J. Documentation and listings of computer program EWEIGHT have been submitted separately to USOE.

Creation of Composite IRF/ESQ Data File

One distinction between the weighted ESQ and IRF data files should be noted. The intended data analyses included correlational analyses of the IRF and ESQ topic, institution, and consumer scores for each institution. Thus, it was necessary to compute average topic, institution, and consumer scores from the ESQ data for each institution which participated in the ESQ portion of the field test. The ESQ weighted data for each student were aggregated by school using a special compositing program to produce one ESQ weighted record per school. The aggregated ESQ topic, institution, and consumer scores for respondents and sample-weighted non-respondents were then averaged for each school, excluding those who had missing topic scores. The IRF weighted data were also used as input to the composite program, and a matching procedure on school code was performed so that one composite record with IRF and ESQ scores was written onto magnetic tape. This concluded the processing of the ESQ and IRF data, which were then ready for data analysis. Documentation and a listing for the composite program (program COMPO) have been submitted separately to USOE.

Student's Consumer Guide

The student's consumer guide (Hamilton, Wolff, & Dayton, 1976) was to be the project's primary non-regulatory strategy to assist secondary school students in obtaining consumer protection data on their own and using them to avoid or deal properly with abusive institutional practices. It was originally conceptualized as a brief, illustrated instructional handbook. Planned information gathering techniques included identifying potential abuses at institutions by reading published school documents, making personal visits, and talking to students, staff, and graduates. Planned use strategies included instructions on how to question actively and complain effectively in the event an abuse was encountered.

Following the preparation of a draft outline for the guide, based on the abuses noted in Appendix B, the literature review, and AIR staff experience in preparing instructional materials for students, we decided it would be beneficial to augment the printed handbook with two audio cassette tapes that could provide models for appropriate student behaviors, and make the guide more attractive to students who might have limited interests in reading. The addition of the cassette tapes also yielded a kit which could be more readily adopted for use in consumer education programs, which are becoming more widespread in secondary schools. Such a kit could have a potential appeal to commercial publishers, which we regarded as an ideal possibility for its large-scale dissemination.

After review by the USOE Project Monitor and two members of the Project Advisory Panels, the outline was expanded and initial drafts of the handbook and tapescripts were completed. Several students, a counselor, and a parent from a high school in Mountain View, California, reacted to the drafts. Based on their reactions, revisions were made and final drafts were prepared; these were reviewed by three media production firms from whom independent bids were solicited for production of the tapes and kit binders. The bid of Media One, Incorporated, Santa Ana, was selected as being most advantageous, and a fixed-price purchase order was awarded. All editing and printing were performed by AIR staff.

The kit was reviewed by the project advisory panelists at their final joint meeting in Washington, D.C. Certain changes and additions were recommended in the guidebook and in the cassette tapes. Subsequently, most of these recommendations were incorporated with additional help from Media One. The final production version of the guide is described later in the Results section of this report.

RESULTS

Field Test of the Information Collection and Analysis Mechanisms

In general, we received courteous and interested cooperation from staff of the 37 institutions which participated in the field test. Along with the fact that we received only 14 flat refusals to participate in the study, we took this as general evidence for the practicality of the interview-based mechanism for collecting information on an institution's consumer protection adequacy. Of the 14 refusals, we estimated that only eight stemmed from any fear of what we might find (i.e., the refusal explanations were not even "reasonable").

Institutional Report Forms (IRF's)

A summary of the edited IRF item responses obtained from the 37 field test institutions is contained in Appendix G, with breakdowns for degree granting (N=12) and occupational training (N=25) institutions.

Based on the item weighting specifications detailed in Appendix I, Table 7 displays the maximum possible weighted topic and institution scores for the degree granting and occupational IRF's. In the course of the field test, we discovered that almost all (nine out of 12) of the degree granting institutions also had occupational preparation programs. We therefore used the occupational institution form as the primary interview guide for the field test, adding the three extra items in the Disclosure topic for degree granting institutions.

As mentioned earlier, the weighted scores could theoretically vary from zero up to the maximums indicated. Zero is a "perfect" score, with each revealed potential for abuse adding points to produce the final sum. Scores are actually averages, calculated on the basis of all IRF items marked; this averaging corrects for the influence of missing data (i.e., skipped items, "not applicable" items). It is useful, however, to consider the IRF topic and institution scores as sums, analogous to a golf score, where the higher the sum, the worse the performance. Table 8 portrays the distribution of actual IRF institution scores obtained in the field test. It may be seen that scores for degree granting institutions of higher education ranged from 110 to 300 and for occupational institutions from 90 to 430. We will present more detailed analyses of these scores later in this section.

Table 7

MAXIMUM POSSIBLE IRF WEIGHTED SCORES

	Topic	Degree Granting IRF # of Weighted Items[1]	Degree Granting IRF Score	Occupational IRF # of Weighted Items[1]	Occupational IRF Score
1.	Refund Practices	11	1000	11	1000
2.	Advertising Practices	11	1450	11	1450
3.	Admissions Practices	11	1090	11	1090
4.	Instructional Staff	8	1130	8	1130
5.	Written Disclosure	43	640	40	650
6.	Student Orientation	5	800	5	800
7.	Job Placement	11	1180	11	1180
8.	Recordkeeping	6	1330	6	1330
9.	Staff Stability	2	2500	2	2500
10.	Status Representation	6	1500	6	1500
11.	Financial Stability	7	2140	7	2140
12.	Instructional Programs	0	--	8	1880
13.	Instructional Facilities	0	--	4	1500
	Institution	121	1070	130	1150

Alternate data sources. In an effort to determine whether IRF data could be obtained without requiring the completion of a questionnaire or an interview, we attempted to prepare, code, and weight an IRF for each institution based only upon an analysis of the publicly available documents (catalogs, brochures, etc.) obtained from that institution in advance of the interviews. No institution had documents which allowed the completion of an entire IRF; two institutions had no information documents at all available to students or prospective students. Table 9 presents a summary of the number of institutions for which we could complete an IRF topic from documents only, along with the correlations[2] between the weighted topic scores calculated from documents only and the basic scores from documents plus interviews.

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[1] These totals actually represent individually-weighted responses, i.e., discrete components of the 55 basic items on the IRF.

[2] These and all subsequent correlations are Pearson product-moment r's, unless otherwise noted.

Table 8

ACTUAL IRF INSTITUTION SCORES OBTAINED IN FIELD TEST

Degree Granting Institutions		Occupational Institutions	
Institution Score	Rank	Institution Score	Rank
110	1.5	90	1
110	1.5	140	2
120	3	150	3
150	4	170	4.5
160	5	170	4.5
170	6	180	6
180	7	200	7.5
210	8	200	7.5
220	9.5	210	9
220	9.5	230	10
230	11	270	11
300	12	280	12
		290	13.5
		290	13.5
		300	15
		320	16
		340	17.5
		340	17.5
		350	19
		370	20.5
		370	20.5
		380	22
		400	23.5
		400	23.5
		430	25

Combined Average = 244

Combined Standard Deviation = 95

Table 9

CORRELATIONS BETWEEN TOPIC SCORES
CALCULATED FROM IRF's BASED ON DOCUMENTS ONLY
AND IRF's BASED ON DOCUMENTS PLUS INTERVIEWS

	Topic	Number of paired scores	r	Probability
1.	Refund Practices	28	.91	<.001
2.	Advertising Practices	8	.63	<.10
3.	Admissions Practices	16	.17	>.10
4.	Instructional Staff	2	--	--
5.	Written Disclosure	35	.91	<.001
6.	Student Orientation	12	.20	>.10
7.	Job Placement	16	.08	>.10
8.	Recordkeeping	4	.52	>.10
9.	Staff Stability	0	--	--
10.	Status Representation	26	.92	<.001
11.	Financial Stability	5	.54	>.10
12.	Instructional Programs	14	.39	>.10
13.	Instructional Facilities	0	--	--
Institution		35	.68	<.001

Table 9 shows that the topics most likely to be contained in documents are Disclosure, Refund Practices, and Status Representation, and that the weighted scores calculated for these topics based only on documents correlate significantly ($p<.001$) with the basic topic scores calculated from documents plus the subsequent interviews. In view of the fact that these three topics contain almost half of the total IRF items, it is not surprising that the overall institution scores also correlate significantly.

Reliability analyses. Although it was not practical to have two separate administrations of the IRF's in all institutions, we did attempt to estimate the reliability of the IRF scores through parallel administrations. In four institutions, two interviewers independently completed IRF's, and the percentages of identically marked items were computed; these were 91%, 87%, 87%, and 94% respectively, an average of 90%.

For all institutions, half-scale topic and institution scores were calculated based on the summed weights of alternative items. The split-half scores were correlated and extended via the Spearman-Brown formula to estimate the reliabilities of the full scale scores. These split-half reliabilities are reported in Figure 3; they ranged from -.25 to .90, with an institution score reliability of .82.

Validity analyses. It was originally planned (see Jung, 1976) to collect several measures of the relationships between IRF scores and external criteria of the adequacy of the field test institutions' consumer protection functioning, such as state agency ratings and default rate of students holding guaranteed student loans. Although we made several serious attempts to gather these external criteria, we were unsuccessful; no state agencies were found whose staff were willing or able to rate schools on our ladder scale (Jung, 1976), and we were unable to obtain GSLP loan default rates from USOE, even for those field test schools which were "institutional lenders" in the program.

We were only able to examine the relationships of IRF scores with some variables which represent rough, unsupported criteria of consumer protection adequacy. For example, if we assume that our method of selecting three states for the field test based on stringency of their laws represents a crude external criterion of adequacy, we find that schools in Missouri have the highest average IRF institutional scores (287.5), California the next highest (274.0) and Minnesota the lowest (261.4); although the differences are not significant ($F=.62$, $p>.10$, $df=2,36$), they are in the predicted direction. For another example, if we assume that accreditation represents an external criterion of consumer protection adequacy, we find that accredited schools have significantly lower IRF institutional scores on the average than non-accredited schools (230.6 for accredited vs. 316.7 for non-accredited; $F=4.53$; $p<.05$; $df=1,36$). For a final example, if we assume that higher education institutions possess a lower potential for abuse than occupational institutions, we find that the average IRF institutional score for four-year degree offering institutions (160.0) is lower than for two-year degree offering institutions (212.0) which is lower than for occupational institutions (274.8); these differences are significant ($F=5.40$, $p<.01$, $df=2,36$).

The above comparisons are shown in a different perspective in Figure 3, which contains the intercorrelations of the IRF scales and their correlations with five created external variables:

	# of Weighted Responses	Split-half Reliabilities	Correlations (Decimals Omitted)																	
1. Ownership Status																				
2. School Type			-45																	
3. Number of Students			-35	58																
4. Accreditation			-27	20	17															
5. Age of School			-16	04	11	-12														
IRF SCALES																				
6. Refund Policies and Practices	11	(.62)	00	-09	-23	-35	09													
7. Advertising Practices	11	(.21)	55	-18	-02	00	03	15												
8. Admissions Practices	11	(-.11)	33	05	14	16	-06	-09	34											
9. Instructional Staff Evaluation	8	(.35)	19	-30	-25	01	04	05	-05	42										
10. Written Disclosure	43	(.90)	16	-37	-35	-21	-14	06	04	-23	23									
11. Student Orientation Practices	5	(-.25)	34	-40	-20	-31	-17	02	24	10	16	39								
12. Job Placement Services	11	(.61)	31	-32	-20	-11	-16	13	13	-12	17	32	07							
13. Recordkeeping Practices	6	(-.02)	44	-23	-24	-28	-10	-16	01	03	10	24	37	00						
14. Staff Stability	2	(.39)	17	09	32	19	06	-27	11	33	-03	00	10	02	-01					
15. Status Representation	6	(.17)	-15	-22	10	-08	-11	-07	-27	-13	09	35	10	30	08	-04				
16. Financial Stability	7	(-.06)	22	-12	-15	-28	-26	09	26	-05	-12	19	24	02	10	-30	18			
17. Instructional Programs*	8	(.87)	48	-28	-17	-26	-05	-02	21	06	25	31	32	-09	65	02	25	23		
18. Instructional Facilities*	4	(.90)	60	-27	-10	-38	-22	13	44	-01	-09	29	54	21	53	13	12	38	60	
19. Institutional Score	130	(.82)	60	-48	-31	-35	-17	17	35	19	41	68	59	42	55	12	39	36	68	72
*N = 34			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18

Figure 3: Reliabilities, Intercorrelations, and Correlations with External Variables for IRF Scales (N = 37 Institutions)

- ownership status (1 = public, 2 = private non-profit, religious affiliated; 3 = non-profit, non-religious affiliated; 4 = proprietary)[1]

- school type (1 = occupational; 2 = two-year degree with occupational programs; 3 = two-year degree without occupational programs; 4 = four-year degree)

- school size (number of first year students)

- accreditation (0 = not accredited, 1 = accredited)

- age of school in years

Any correlation in Figure 3 greater than .32 represents a significant relationship ($p<.05$, $df=35$). Among the most interesting are those between IRF institution scores and accreditation (-.34), school type (-.48), ownership status (.60), and school size (-.31). These values may be interpreted to show that accredited, degree offering, and public schools score lower (better) on the IRF than non-accredited, non-degree offering, and private schools, and that larger schools tend to score lower than smaller schools.[2]

Other analyses related to IRF validity will be presented in conjunction with the analyses of the ESQ data.

Enrolled Student Questionnaire (ESQ)

A summary of the sample-weighted (i.e., unit-weighted respondents plus 15-weighted non-respondents) responses obtained from students in 26 field test institutions is contained in Appendix H. Perhaps the most important figure in this Appendix is that fully 41% of the first year students reported that they were no longer enrolled in the institution from which we had obtained their name and address only two months earlier. The figure is broken down 38% for degree granting institutions and 49% for occupational training institutions; both percentages are high, and they may reflect a misunderstanding of the word "enrolled." Since the two month delay in obtaining OMB forms clearance unavoidably pushed the student survey into the summer months, it is possible that students who were intending to reenter school in the fall responded in the negative to this item, believing it referred to "attending classes."

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[1] Note that this variable's coding is a revision of the original coding as described in Appendix I.

[2] Since accredited, degree offering, and public schools tend to be larger, we calculated several partial correlations to determine whether the significant relationships with IRF institution score remained when the influence of size was removed; the results were -.31, -.39, and .51 for accreditation, school type, and ownership status respectively. In general, then, the obtained relationships are independent of size.

Thirty-three percent of the students who responded indicated they were not informed of their school's policy for refunding fees which were paid before they started classes, and few (under 14%) knew the length of time it took to get a refund if they were entitled to one. Only 26% of the students in occupational training institutions reported they had filled out written evaluations of their instructors, while the corresponding figure for degree granting institutions was 87%, although, of these, 62% reported they did not get to see the results of the evaluations. Only 52% of the students in occupational institutions reported that they had received an orientation to the school's policies when they first enrolled; the corresponding figure for degree granting institutions was 79%; only 27% of the former and 38% of the latter reported the orientation included instructions on how to file a complaint or a grievance. Thirty-four percent of all students felt they had been affected by overcrowding and 22% felt that they had been required to use worn or outdated equipment and facilities at their school. Thirty-five percent of occupational school students and 27% of degree granting school students reported their school had advertised that graduates would "probably" get jobs as a result of their training; four and two percent respectively reported that post-training jobs were "guaranteed." Overall, however, 69% of occupational school students and 80% of degree granting school students reported they were highly or moderately satisfied with the quality of education they were receiving.

Based on the item weighting specifications detailed in Appendix J, Table 10 displays the maximum possible topic and institution scores for the ESQ. Since the ESQ as revised for the field test was not designed for a regulatory purpose (instead it was designed as an attempt to provide data for validation of the primary regulatory instrument -- the IRF), the obtained ESQ institution scores are not presented in this report.

Split-half reliabilities were calculated in the same manner as for the IRF. These reliabilities, which ranged from -.27 to .52 for the topic scores, with an institution score reliability of .43, are reported in Figure 4. Figure 4 also contains the correlations of the ESQ scores with IRF scores and the same five external variables discussed in conjunction with Figure 3. Any correlation

Table 10

MAXIMUM POSSIBLE ESQ WEIGHTED SCORES

	Topic	# of Weighted Items[1]	Score
1.	Refund Practices	6	1670
2.	Advertising practices	11	3000
3.	Admissions Practices	10	2000
4.	Instructional Staff	9	670
5.	Written Disclosure	8	3000
6.	Student Orientation	12	1670
7.	Job Placement	8	1500
8.	Staff Stability	2	3500
9.	Status Representation	8	3000
10.	Instructional Facilities	3	2000
Institution		77	2000

in Figure 4 greater than .39 is a significant ($p < .05$, df = 24). Of primary interest is the .30 correlation between IRF institution score and ESQ-obtained student ratings of satisfaction with the quality of their education. The correlation between ESQ institution score and this same consumer rating (.68) is significant beyond the .01 level (df = 24). The marked diagonals in Figure 4 enclose all correlations between corresponding IRF and ESQ scales, which range from -.16 to .50, with an institution score correlation of .42. The fact that the items in the ESQ scales were altered away from parallel construction prior to the field test makes these correlations less useful for estimating concurrent validity; however, the average obtained correlation of .27 is nevertheless encouraging.

Although the low ESQ scale reliabilities cast doubt on the stability of these obtained relationships, the obtained correlations indicate that student perceptions do agree to some extent with information obtained from the IRF's.

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[1] As with the IRF's, this count represents weighted responses, discrete components of the 29 basic items on the ESQ.

	# of Weighted Responses	Split-half Reliabilities	Correlations (Decimals Omitted)																														
1. Ownership Status																																		
2. School Type			-36																															
3. Number of Students			-34	56																														
4. Accreditation			-27	12	08																													
5. Age of School			-27	22	18	-07																												
IRF SCALES																																		
6. Refund Policies and Practices	11	(.62)	-04	-05	-25	-26	-12																											
7. Advertising Practices	11	(.21)	46	-18	-10	08	-10	14																										
8. Admissions Practices	11	(-.11)	34	15	13	02	-06	-09	07																									
9. Instructional Staff Evaluation	8	(.35)	20	-27	-25	-10	-05	13	-06	40																								
10. Written Disclosure	43	(.90)	-01	-34	-33	-33	07	05	-08	-20	41																							
11. Student Orientation Practices	5	(-.25)	27	-47	-19	-35	02	-11	16	14	31	41																						
12. Job Placement Services	11	(.61)	26	-19	-13	-15	-35	08	19	-22	10	29	05																					
13. Recordkeeping Practices	6	(-.02)	47	-15	-13	-19	01	-28	15	39	26	11	38	-13																				
14. Staff Stability	2	(.39)	12	05	32	08	00	-29	-17	36	04	10	19	12	05																			
15. Status Representation	[illegible]	(.17)	-18	-20	20	-22	-15	-02	-04	-02	13	48	32	34	-13	07																		
16. Financial Stability	7	(-.06)	11	-06	-09	-41	12	19	36	-01	-18	-08	24	-04	-02	-33	21																	
17. Instructional Programs*	8	(.87)	53	-30	-11	-34	02	09	43	42	40	33	42	01	70	05	19	14																
18. Instructional Facilities*	4	(.90)	61	-22	04	-17	-03	03	62	44	08	02	40	11	48	26	22	37	68															
19. Institutional Score	130	(.82)	47	-39	-23	-43	-09	16	35	35	55	63	61	37	47	19	50	23	79	67														
ESQ SCALES																																		
20. Refund Policies and Practices	6	(-.07)	02	02	-04	-01	13	[illegible]	15	18	11	-21	-19	-06	00	-09	-22	13	00	09	01													
21. Advertising Practices	11	(.52)	63	04	01	-40	09	-17	14	-17	-15	-08	20	-06	38	31	-38	16	30	37	15	-17												
22. Admissions Practices	10	(-.15)	-23	-24	-22	-01	06	-13	21	-16	12	30	35	26	-22	-29	42	19	-10	-13	17	-23	-45											
23. Instructional Staff Evaluation	9	(-.27)	29	-56	-48	-11	-29	39	21	12	44	32	40	40	19	15	12	15	32	31	59	18	01	11										
24. Written Disclosure	8	(.06)	-23	-22	-19	-01	-07	-04	-11	-12	07	[illegible]	23	13	-06	-21	38	38	-03	09	18	-08	-37	24	08									
25. Student Orientation Practices	12	(-.22)	20	-18	11	-56	21	01	06	-02	-07	30	[illegible]	14	19	12	52	48	32	45	50	-02	31	-03	20	10								
26. Job Placement Services	8	(-.02)	22	-01	00	-90	13	17	-14	01	07	16	30	[illegible]	27	-12	11	36	32	16	30	-03	52	-09	01	-06	52							
27. Staff Stability	2	(.17)	40	-14	-03	-03	-03	-37	32	10	-10	-15	24	-06	-06	[illegible]	-33	08	-04	16	-08	-18	49	04	-14	-15	-04	-01						
28. Status Representation	8	(.26)	-36	03	02	06	10	-21	-12	-28	-29	-04	11	24	-13	-02	[illegible]	22	-26	-04	-10	-09	-29	36	08	50	15	-09	-05					
29. Instructional Facilities	3	(.19)	04	22	05	00	28	-17	11	12	-30	-36	13	00	02	-02	-08	43	-15	[illegible]	-10	20	18	13	01	14	31	14	13	59				
30. Institutional Score	77	(.43)	29	-29	-21	-40	16	-07	32	05	00	15	61	28	12	06	19	60	18	44	[illegible]	09	31	38	39	24	60	38	36	47	69			
31. Quality of School Education			17	-08	-02	-27	10	-07	09	-08	-19	11	20	39	05	25	28	37	16	34	30	-03	29	07	28	05	57	24	19	55	53	68		
32. Protection of Student Rights			-41	02	-04	-03	28	16	-05	-10	25	37	19	07	-15	-09	21	-02	01	-10	20	-30	-27	33	25	20	17	-02	-26	19	-08	08	-08	
33. Knowledge of Own Rights			-33	-01	-09	13	11	-21	-08	-35	-08	09	18	-06	-37	-28	22	17	-33	-28	-20	-25	-28	34	-29	47	15	-12	13	32	22	19	-04	30
*N = 25			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32

Figure 4: Reliabilities, Intercorrelations. and Correlations with External Variables and IRF Scales for ESQ Scales (N = 26 Institutions)

Student comments. In the course of processing the ESQ's, we received 998 written comments about the questionnaire or the field test institutions. These comments were analyzed with the following results: 539 comments on specific ESQ items; 49 positive and 49 negative general comments on the questionnaire; 58 positive, 105 neutral, and 149 negative comments on institutions (one 25 handwritten pages long); and 47 miscellaneous comments. Examples of these comments are included in the data submitted separately to USOE.

Revisions in Instruments

Following the instrument field test, minor changes were made in the wording and organization of the basic IRF for occupational training programs. These changes were consistent with the comments and observations of field test participants and our own judgments about correcting some of the instrument's weaknesses and inconsistencies as revealed by the field test. The revised instrument is contained in Appendix M; alterations to make it appropriate for degree granting institutions or programs are contained in Appendix N. Coding and weighting procedures were not modified. This means that the editing, coding and weighting instructions contained in Appendix I remain appropriate for the revised IRF (Appendices M and N).

User Guides

Regulatory and Accreditation User Guides

These two guides are formally entitled System for Collecting, Analyzing, and Using Information on Institutional Consumer Protection Practices: Regulatory User Guide (Jung, Gross & Bloom, 1976a) and System for Collecting, Analyzing, and Using Information on Institutional Consumer Protection Practices: Accreditation User Guide (Jung, Gross & Bloom, 1976b). They, and the system they describe, represent the primary products of our regulatory approach to improving consumer protection in postsecondary education. They are intended to assist state and federal school regulatory agency officials (i.e., those who have direct governing authority over institutions or authority to affect the eligibility of institutions for federal funding programs) use the IRF's and their associated administration, coding, weighting, and data analysis mechanisms. The contemplated uses are discussed in the Recommendations section of this report.

The guides are written in a how-to-do-it style, with examples, and include appendices designed to support all of the contemplated uses. Appendices include the revised IRF and a copy of the weighting and processing computer program for the IRF data.

Student's Consumer Guide

This guide represents the primary product of our non-regulatory approach to improving consumer protection in postsecondary education. Each Safeguarding Your Education kit consists of a brightly colored three-ring binder with the title imprinted on the cover. Inside, the binder contains two moulded pockets which contain the two audio cassette tapes: Tape 1: Traps to Avoid -- What to Ask/Who Can Help, and Tape 2: Three Case Studies. It also contains the Student Consumer's Guidebook, a 44-page 8 1/2 x 11 inch glossy printed handbook, which includes text and illustrations on the following topics:

- Deciding What To Do After High School
- The Rip-Off Catalog
- An Ounce of Prevention
- What You Can Do
- Sample Educational Complaint Letters and Form
- Glossary of Terms
- Tape Listening Guides (What to Listen For)

The first tape is designed to be humorous and attractive to high school age youth. It is narrated throughout by two teenagers, and it includes: parodies of the Tonight Show and a radio "talk" program; simulated school advertisements; a simulated interview with a school recruiter; dramatizations of cases where students discuss abuses that they encountered; and a summation.

The second tape contains one real and two simulated case studies in which students discuss the circumstances of actual abuses which were documented by our research.

Throughout the kit, the language is simple and straightforward; the tone strives to convey a spirit of caution and to impart motivation to explore available options before making a decision. Examples and discussions are provided which are appropriate to both occupational training and higher education as postsecondary options.

Pilot tests with small numbers of students, parents, and counselors and consultant reviews produced extremely favorable reactions to the kit. In general, the consensus opinion was that it did in fact fulfill our original intentions and represented a viable consumer protection strategy for the non-regulatory approach.

DISCUSSION AND CONCLUSIONS

A number of conclusions may be stated based on the results reported in the previous section. Most importantly, if the results of the field test are at all representative, and we believe they are, it appears that some potential for student abuse exists in almost every postsecondary institution. This is not to suggest that institutions are engaging in malpractice on a massive scale; many of the potentials are very minor, and they are weighted as such. In order to make a more definitive probability statement about the extent and magnitude of potential, a survey designed for that purpose would be required. The present study was not so designed.

Regulatory Approach

The reliability and validity estimates for the institution scores derived from the IRF Interview Guide appear to be satisfactory for the potential uses we identified at the beginning of the field test. These uses, which will be discussed at greater length in the next section, include institutional self-study, setting minimum eligibility standards, an "early warning" system, and the basis of a formal communication network among the partners in the tripartite eligibility system. The reported validity estimates should be treated as lower bounds for the actual validities of the institution scores. This is because the 14 institutions which refused to participate in the field test probably would have produced some very high (poor) scores had they participated. The fact that we did not obtain these scores biases the obtained results in some unknown and unknowable way. In any event, it is probably true that restriction of range produced some reduction in the obtained correlation coefficients used earlier to estimate validity.

Many of the individual IRF topic scores do not appear to have sufficient reliability to permit their use in any form of "profile" analysis or other differential application, but other topic scores possess considerable reliability, especially those for Written Disclosure, Instructional Programs and Facilities, Refund Policies, and Placement. We considered removing some of the low-reliability topics from the IRF. However, the topic scores are not highly intercorrelated; the average r, calculated using Fisher's z transformation, is only .32 (see Figure 3). In revising the IRF Interview Guide following the field test, we therefore decided that the common scale variance was sufficiently low and the face validity of the instrument was sufficiently enhanced to keep all 13 topics, with the small wording and format changes already mentioned. All of the uses recommended in the next section (or in the regulatory user guides) call for application of the IRF institution score only.

There was some intent at the beginning of this project to develop the ESQ into a companion instrument to the IRF that could also have practical applications for the regulatory approach, especially as a method for checking on the accuracy of institutional officials' reports of their school's policies and practices. However, the changes recommended by our advisory panelists prior to the field test, the considerable logistical difficulties and costs of obtaining unbiased student data, and the low obtained scale reliabilities (reported in Figure 4) argue against any future applications. The real values of a student data collection system administered via a central mechanism appear to be the collection of comparable data on: (a) student dropout rates, job placement rates, beginning salaries, satisfaction with programs, and other similar education "outcome" data and (b) student demographic characteristics, reasons for attending, sources of satisfaction, costs, and other data useful in helping other students make better decisions about which institutions will provide a better match with their own characteristics and needs. These values are outside the realm of educational consumer protection as we defined it; moreover, they are apparently already being well served by other data collection systems in both the occupational (e.g., Hoyt, 1973) and the higher education (e.g., Abel, 1975) areas. The ESQ was not revised following the field test and is not included in any of our recommendations.

We were able to obtain institution scores based on an analysis of public institutional documents which correlated significantly (.68, $p < .001$, $df = 33$) with institution scores based on the documents plus an interview. This was a very signficant and encouraging finding. It argues that half of the variance in an institutional measure of consumer abuse potential may be predictable by an institutional measure of (primarily) disclosure effectiveness, even though the latter measure does not encompass the majority of topics thought to be essential components of the former measure. This further suggests that institutional scores of acceptable reliability and validity might be obtained simply from an analysis of already published documents, without the requirement for a costly data collection mechanism. The implications of this assumption deserve careful consideration, however. For example, if it became known that document analysis was to be used as a method of selecting institutions for more intensive regulatory scrutiny, it might be predicted that the quantity of disclosure would rise and the correspondence between disclosed and actual situations would decline. An auditing mechanism, similar to the one we originally proposed for the self-report IRF drafts, would be required. In any case, future studies should pay careful attention to document analysis as a promising and unobtrusive data collection mechanism.

It is apparent that our inability to field test a self-report version of the IRF places limitations on the possible follow-up implications. The interview-based system we were able to field test has logistical constraints which make it appropriate for a limited range of applications. Nevertheless, these applications can have a definite impact on improving the protection of postsecondary students. If favorable impact can be demonstrated in the future as a result of interview-based applications, we hope that a self-report based IRF data collection and auditing system can be approved for field testing with less trepidation on the part of federal government officials whose role is to protect citizens from unnecessary or unwise data collection efforts.

Non-Regulatory Approach

It was generally agreed that the Safeguarding Your Education kit represented a strategy through which individual students and their families could invest a small amount of time and effort to arm themselves against institutional abuse. This consensus was made even stronger after the kit had been broadened to include intact secondary school classes as part of the target audience. There were, however, some negative reactions, which generally indicated that the kit went overboard in its portrayal of institutional abuses, in much the same way that FTC's Charlie's School pamphlets had done earlier. We carefully considered these reactions in light of the kit's intent. We concluded that the portrayed abuses were real and that the use of caricatures was an effective and justified medium of instruction for students. Unlike the Charlie's School series, the Safeguarding Your Education kit does contain many disclaimers to the effect that student abuses are not widespread nor are they restricted to one particular segment (i.e., proprietary) of the postsecondary universe. For our non-regulatory strategy to succeed, however, the kit must be widely disseminated, especially to those persons who are most threatened by abuse: the students who will be receiving financial assistance directly from federal or state government programs (e.g., BEOG's, GSL's, etc.).

One possible mechanism that is not recommended later but that should be explored is dissemination under the auspices of the financial aid programs themselves; this might be especially attractive to the state loan programs, where the guide could be modified to discuss the particular conditions of a state program, including the provision of specific names and phone numbers for students to contact to obtain further information or to report a complaint.

FOLLOW-UP IMPLICATIONS

The following are follow-up implications for the regulatory and non-regulatory strategies developed and field tested during this project. We feel each is practical and feasible, based on the field test results presented earlier; moreover, the implications generally fit in well with recommendations offered by previous USOE efforts to improve student consumer protection in postsecondary education (e.g., Task Force on Implementing Educational Consumer Protection Strategies, 1976).

There is currently a vast reservoir of untapped good intentions on the part of administrators of postsecondary institutions in the United States. Few institutions, regardless of their ownership status or the nature of their educational offerings, engage in intentional malpractice. However, school administrators are still largely insensitive to the real nature of student consumer abuse. *(1) The categories, examples, and indicators of potentially abusive institutional practices produced by this project should be brought to the attention of the chief administrative officers of every institution which gains eligibility to participate in federal student assistance programs.* This would allow them to voluntarily correct potential abuses without obtrusive regulatory intervention. Remedies for the conditions and practices listed in Appendix B are not unreasonably costly; they should be within the budget of administrators in every institution.

During the routine follow-up to our interviews in the 37 field test institutions, we noted several minor changes in institutional policies which related to the IRF questions. These changes occurred within a period of only three months. *(2) Dissemination of the information called for in Implication One should be followed-up with an assessment of the information's impact on institutional self-study and self-improvement.* This should precede any major attempt by USOE to institute new regulatory efforts to control abusive institutional practices. The assistance of USOE-recognized accreditation agencies and state school licensing, approval, and governing agencies and boards should be solicited in this impact assessment. The question to be answered is: Can voluntary self-improvement efforts, based on knowledge of the essential dimensions of student consumer abuse, bring about sufficient changes to preclude the costs, inconveniences, and erosion of autonomy that must result from increased government regulation?

(3) The student guide *Safeguarding Your Education: A Student's Consumer Guide to College and Occupational Education* *should be commercially published and disseminated nationwide.*[1] In addition, USOE should consider making the guide available free to counselors and students involved in federal programs such as Upward Bound, Talent Search, Special Services for Disadvantaged Students, Equal Opportunity Centers, etc. As with the first recommendation, *(4) a systematic assessment of the guide's impact on student ability to avoid or deal effectively with abusive institutional conditions and practices should be carried out.* This assessment should also be done prior to instituting any major regulatory changes.

Minimum Eligibility Standards

Minimum eligibility standards are those below which an institution's application for participation in federal student assistance programs could be refused or its on-going participation could be limited, suspended, terminated, or otherwise placed in jeopardy, subject to the requirements of legal due process. As was pointed out in the literature summary, there is a great deal of controversy about the authority of USOE to set minimum eligibility standards, especially in the area of education consumer protection. In general, USOE's position has been that consumer protection is a role better played by (a) state agencies as a part of the "state authorization" prerequisite for eligibility or (b) private accreditation agencies, as part of the "accredited by a USOE-recognized accreditation agency" prerequisite for eligibility. USOE has taken steps to survey the effectiveness of and help strengthen state authorization as it relates to student consumer protection (see for example Hamilton, Jung, Helliwell, & Wheeler, 1976). USOE policy has also attempted to move accreditation agencies into a more active role in certifying institutional "probity" as an integral part of institutional "quality" (see Proffitt, 1976). These attempts have not been entirely successful, due largely to a natural reluctance on the part of some accreditation agencies to become "policemen" for the federal government (Young, 1976). Notwithstanding Orlans' characteristically caustic remark that "the attempt of some USOE officials to plant consumer protection in the accreditation process is as promising as a crop of Arctic coconuts" (Orlans, et al., 1974, p. 21),

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[1] At the time of this writing, AIR staff were in touch with commercial publishers and USOE officials in hopes of assisting with the implementation of this recommendation.

(5) USOE-recognized accreditation agencies should be encouraged to urge an increased awareness of student consumer protection on accredited institutions. The *Accreditation User Guide* contains specific mechanisms for carrying out this recommendation; a first step would be for DEAE to disseminate a copy to each recognized accreditation agency. In the long run, such informal action might be more effective than attempting to modify federal laws or regulations to *require* recognized accreditation agencies to certify "probity."

Regardless of the results produced by attempts to foster institutional self-improvement and involve non-governmental accreditation with consumer protection efforts, it is inevitable that the officials of some institutions will allow abusive conditions or practices to remain or emerge. In these cases, it seems *incontestable* that it is the duty and the responsibility of the federal government to protect the rights and property of students who are being assisted with government funds to earn an education which will improve their lives. As part of the general conditions for eligibility for federal student assistance programs under Title IV of the Higher Education Act, the Commissioner of Education is authorized to establish regulations which are designed to "promote the purposes of the programs," including regulations which prescribe "reasonable standards" of financial responsibility and appropriate institutional capability for eligible institutions. A select USOE task force recently concluded these statutes give USOE "the responsibility to insure that...the recipients of such funds are adequately protected against unscrupulous practices," and called for "continuous review (of) the criteria for determination of, or termination of, eligibility for institutional participation in OE administered financial aid programs, and...appropriate recommendations for change." (Task Force on Implementing Educational Consumer Protection Strategies, 1976, pp. 2-3) *(6) We recommend that this review should include consideration of minimum consumer protection standards based upon preventing the types of abuse listed in Appendix B.* When this review process moves to the consideration of ways to *enforce* minimum consumer protection standards, we recommend that USOE carry out a field test of a *self-report* based IRF system. Participation in this field test should be *required* in a representative sample of institutions as a condition for maintaining eligibility. The test should include the development of a system for auditing IRF's and for administering negative sanctions in cases of intentional or unintentional misreporting.

Early Warning System

Some states already have strong minimum standards and enforcement resources to protect students from institutional abuse. It is possible that the federal government will need to develop such standards in the future for institutions which seek or hold the privilege to participate in federal assistance programs. A major problem in any regulatory system is the sheer magnitude of schools which must be licensed, approved, or certified as eligible and then monitored for continuing compliance. For example, over 8300 institutions currently are eligible to participate in the Guaranteed Student Loan Program. The problem is compounded when money is not available for hiring personnel to inspect schools, investigate suspected violations, and prosecute actual violators. It is compounded even further when a government agency is responsible not only for eligible institutions, but, as in the case of most state regulatory agencies, for all institutions operating in the state -- whether or not they have applied for federal funds. Given the facts of limited resources and sometimes spontaneous occurrence of consumer abuse after long periods of acceptable operation, there is a great need for an "early warning" system which can be used to periodically monitor the consumer protection policies and practices of postsecondary institutions. Ideally, such a monitoring system (a) would require a minimum of effort, both on the part of the institution and the monitoring agency, and (b) would fit easily into the existing inspection/approval systems already in operation, yet (c) would reliably flag potential problem institutions for more intense scrutiny. *(7) USOE should provide funds to several selected state governments to carry out and evaluate the impact of state-level implementation of the interview-based information collection, analysis, and use system developed in this project.* States should be selected from among volunteers and should have sufficiently stringent consumer protection laws and regulations governing postsecondary institutions to take strong action to force corrections if abusive institutional practices are detected. All state agencies responsible for authorizing or overseeing postsecondary institutions should receive a copy of the Regulatory User Guide, and the results of the early warning system test in selected states should be disseminated widely. If the results are encouraging, *(8) USOE should offer financial and technical support to all states to develop or augment institutional monitoring systems for the purpose of preventing abusive practices. (9) USOE should then establish a center in DEAE for sharing and disseminating* *state agency-produced IRF scores for institutions which operate across state lines.* This center should be the first step in a general attempt to improve data exchange between states and USOE. The exchange process will involve complex issues of territoriality, ownership of information, privacy, quality control, and funding. It should be inaugurated with the widest possible discussions and a substantial step-by-step phase-in period.

Communications Among Tripartite System Agencies

The tripartite system of institutional eligibility for federal programs exemplifies a system of independent, overlapping responsibilities and mutual checks and balances among two regulatory partners -- the states and USOE -- and a non-regulatory (and sometimes unwilling) partner -- private accreditation. As with any system of this nature, its functioning can be improved if the partners understand their own responsibilities and cooperate with the other partners in the exercise of their respective responsibilities.

Earlier in this section, we contended that the responsibility of the government regulatory partners is to establish, monitor, and enforce minimum consumer protection standards on institutions who wish to participate in the USOE-administered student assistance programs. We accepted the accreditation responsibility as one of evaluating, certifying, and helping to improve the quality of an institution's educational program relative to its stated educational goals. But since educational quality would seem to be impossible without minimum institutional consumer protection policies and practices, all three partners have a reasonable interest in systematic mutual communications. And the central element of shared interest is information on the consumer protection policies and practices of institutions seeking to gain or hold the privilege of eligibility. DEAE, as the coordinator of the tripartite system, is the logical center for communications of such mutual interest; but if DEAE alone controls communication efforts, its role as a partner can easily be confused with the role of a patron, especially in such a politically sensitive environment.

(10) DEAE should work with organizations which have developed a strong record of promoting communications among the tripartite partners to carry out an Annual Working Conference which would foster informal communications and construct and implement a plan for a formal communication network among the

tripartite partners and other interested agencies. Organizations to be involved should include the Postsecondary Education Convening Authority of George Washington University's Institute for Educational Leadership, the Education Commission of the States, and the Federal Interagency Committee on Education. Participant agencies should include student organizations (e.g., the National Student Education Fund), institutional representatives (e.g., the associations at One Dupont Circle), the states (e.g., the State Higher Education Executive Officers, the National Association of State Administrators and Supervisors of Private Schools), accreditation agencies (e.g., the Council on Postsecondary Accreditation), USOE (e.g., DEAE and other program offices in the Bureau of Postsecondary Education and the Office of Management, the National Center for Educational Statistics), and DHEW (e.g., the Office of Consumer Affairs, the Office of General Counsel).

The Annual Conference would: (a) preserve and build on the considerable investment already made by USOE, the states, accreditation bodies, consumer groups, and researchers in preserving the concept of an "eligibility system"; (b) provide a regular rather than an ad hoc forum for the discussion and resolution of roles, problems, and solutions; and (c) provide a mechanism for the involvement and consultation of parent and consumer organizations, labor unions, and representatives of private business. The agenda should include the identification of data which are unique to one or more of the tripartite partners but would be useful to the others in making decisions which are confined to their own sphere of influence. There should be discussions of specific proposals for involving all the parties in a system for collecting and sharing information about the educational consumer protection policies and practices of eligible institutions. An advantage of IRF scores as one message for such sharing is that these data are relatively objective and standardized in their meaning. They are therefore not dependent on the inconsistent laws, regulations, definitions, policies, etc. of any one partner in the tripartite system.

Future Research

Every research report ends with recommendations for future research. This report is no exception. The study described in the preceding pages represents one of the first efforts ever to actually define potential student consumer abuse and then measure it in postsecondary institutions; much remains to be done.

(11) Immediate steps should be taken to carry out detailed investigations of unexamined student complaints (e.g., the student complaint files of the Office of Guaranteed Student Loans and the Division of Basic and State Student Grants) to validate and extend if necessary the abuse categories contained in this report (Appendix B). As soon as possible, the results of these investigations should be made a part of the materials sent to eligible institutions and recognized accreditation agencies under Implications One and Five. These categories should be continuously (or at least periodically) revised based on on-going complaint analyses to keep them abreast of changing institutional abuse patterns. The abuse indicators, IRF, and associated data analysis procedures developed during this project should also be revised in the event USOE contemplates using them or supporting their use by state regulatory agencies.

Continued development of this project's information collection and analysis mechanisms should include attempts to gather better data on external consumer protection adequacy criteria such as quantitative ratings by knowledgeable state regulatory agency officials and student loan default rates from the GSL Program. If success is encountered in previously recommended efforts to modify the IRF from an Interview Guide to a self-report questionnaire, efforts should also be made to accommodate IRF institution scores into the design of DEAE's contemplated computerized data processing and management information system. This would allow the development of a capability to correlate IRF scores with frequencies and types of student complaints received by DEAE. It would also have implications for the design of the early warning and mutual communications system discussed previously.

The present study did not attempt to include strategies for consumer protection in either correspondence instruction or in external degree programs offered off school premises. The reviewed literature did indicate that student abuses have occurred in these types of postsecondary education. Many of these abuses apparently overlap with those listed in Appendix B. The growing popularity of home-study and "non-traditional" degree programs makes them a growing concern, however, especially since USOE-administered assistance monies can go to students in both. *(12) A study of institutional abuses which are unique to student consumers of correspondence instruction and non-traditional external degree programs should be carried out immediately.*

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APPENDIX A

EXAMPLES OF COMPLAINTS IN DEAE COMPLAINT FILES

Sample size: 115

Sample of classifiable student complaints: 105

Many students complained of several facets of a school's operation; therefore incidents collected from the 105 complaint descriptions total 242.

1. Thirty-seven complaints concerned lack of tuition and fee refunds or refund policies. Examples are:
   a. S was told by the school that there was a refund policy if S was dissatisfied after three months and that her loan was 100% transferrable to another school. The refund period was, in fact, only one week.
   b. S was due to be drafted at the time he considered enrolling in school. The school representative assured S that the school could get him deferred, so he enrolled. But he received his induction notice soon thereafter, and informed the school immediately. He was refunded only $25 of the $175 tuition.
   c. S provided written notice that she was dropping out of the program for personal reasons. The director assured her that she would lose her $50 down payment only. She was billed for $417.
   d. S was advised that she could drop the program after five days and lose only $25 and that her loan would be stopped. She later received a bill from the bank for $181 owed it.
   e. S notified the school in writing that she did not desire to enter classes and that a refund was requested. S said her contract entitled her to a rebate but she hadn't received it yet.

2. Thirty-six complaints concerned misleading recruiting practices. Examples are:
   a. S was promised by the school sales representative that the school was equipped to teach mechanical drafting. When S began classes, he found the instruction to be in architectural drafting with no other drafting courses available.
   b. The school told S that for every new student recruited by a current student, the current student would get four units of course credit. Also, if a new student brought four friends with him, he would not have to pay tuition.
   c. The school has dropped an airline course, but is still enrolling students in the course and then informing them that it has been dropped.
   d. The sales representative quoted starting salaries in the field as higher than they actually were, and said that jobs were easy to find when in fact they were not.
   e. The sales representative said he was from the Veterans Administration and it was his job to help veterans further their education. He offered S's wife a job locating veterans in the phone book.

3. Thirty-one complaints concerned inadequate instructional programs. Examples are:

   a. S's first quarter courses were very elementary and S was dissatisfied. The computer lab consisted of "a few typewriters and two keypunches," and instruction in computer operation was not included as part of the course.

   b. The school was supposed to provide full-time day classes in progamming. The class in programming was in fact offered three nights a week.

   c. S felt that the school was teaching her about office machines during the first three months of the course and that this left too much information to be learned in the second three months.

   d. The secretarial course did not include accounting and only very little bookkeeping.

   e. Home study lessons were inflated, repetitious, sometimes trivial and offered little preparation for field training.

4. Twenty-six complaints concerned inadequate instructional staffs. Examples are:

   a. The teacher appeared never to have been an auto mechanic and would read to the class from a manual.

   b. The teacher taught "above his student's heads." He would assign reading from the required texts and never discuss the material in class.

   c. S attended early sessions of the class but dropped out because the teacher "didn't know what she was talking about."

   d. Instructors were generally hostile and were unwilling to provide individual assistance.

   e. Instructors paid little attention to the way answers were written, though this was supposed to be an important part of the course of instruction.

5. Twenty-six complaints concerned lack of necessary disclosure in written documents. Examples are:

   a. S missed "a few classes" and was informed that she had been dropped from the school. No policy on absenteeism had been announced.

   b. S signed a promissory note but it said nothing about the bank carrying the loan.

   c. S was given her course schedule, which did not list her homeroom class. She was unaware of the class and so didn't attend it. After two weeks, she was informed that she would not be credited with attending school for that period.

   d. S registered for a course costing $655. Within a month, the school informed S that the price had increased and that he was obligated to pay the increase.

   e. The contract stated that dismissal was to occur only for violating rules of attendance and conduct in class. S did not violate any of these rules; he couldn't learn as fast as the instructors wanted, but was dismissed nevertheless.

6. Twenty complaints concerned inadequate instructional equipment and facilities. Examples are:
   a. The school was overenrolled with students on loans, so classes were crowded and restroom facilities inadequate; also laboratory materials were inferior.
   b. S couldn't continue her accounting courses because the books were not available.
   c. S found that the school did not have necessary electronics lab equipment, as represented.
   d. Equipment was inadequate for the number of students in class; also, it was "defective."
   e. The only equipment available was a tune-up machine and one old auto engine for demonstrations.

7. Twenty complaints concerned lack of adequate job placement and follow-through. Examples are:
   a. S requested assistance from the school (promised in the catalog) in getting a full-time job. The school felt that since S had a part-time job, they had no obligation in this area.
   b. The school placement director had little experience in placement or in the computer field. S was told to prepare a resumé indicating that he wanted a data processing position, though he was trained in programming and felt the two areas were not the same.
   c. S was promised a job within three to four weeks of arriving at the school. When he arrived, he was told that he would have to wait two to three months.
   d. Though the training offered by the school was in medical assisting, the job leads they offered S were only for typing jobs.
   e. The school was supposed to provide placement assistance so S could get a job while there. They provided a newspaper and left S on his own to find a job.

8. Nine complaints concerned lack of adequate student selection/orientation practices. Examples are:
   a. S has had only a ninth grade education but was not asked about her previous education when she enrolled.
   b. The school was enrolling students without the ability to benefit from training offered. S was enrolled by a school salesman without any interviewing or testing. Later he was tested with the following results: moderately retarded, hearing, speech, and coordination problems, and a reading problem.
   c. S was told that the school enrolled only students with aptitude in the area, but S found students in her classes who did not speak English.
   d. S was given a short test on the basis of which the school said she could do the work. She spent nine months in classes which were too difficult for her.
   e. Classes were below S's level. There was minimal counseling available.

9. Nine complaints concerned lack of adequate housing facilities. Examples are:
   a. Housing was filthy, and S couldn't move without being dismissed from school.
   b. S was accosted by two men in the school-operated dormitory.
   c. Housing was poor: thievery, dope raids by police, and minimal recreational facilities. Also plumbing did not work properly, and the smoke residue from a fire in the building had not been cleaned up.
   d. S was promised housing which was not provided.
   e. The housing arrangement was supposed to be four to an apartment; there were in fact six in each.

10. Eight complaints concerned untrue or misleading advertising. Examples are:
    a. S saw ads for a data processing course being offered by the school, but when she went to enroll, she was told that the course was not available and that she should enroll in programming instead.
    b. The school provided misleading promotional material regarding the type of position for which training qualified a graduate, the availability of job interviews at the school, and the availability of airline jobs to graduates.
    c. School literature said S would have extensive experience in a truck simulator. He received less than one minute in the simulator.
    d. The sales pamphlet promised 3 educational advisors, 11 faculty, and many part-time instructors. There was in fact only one instructor for the entire class of 62.
    e. The school pamphlet said that the school was accredited, that teachers were well qualified, and that the school had special training labs with closed circuit TV and other equipment. None of this was true.

11. Seven complaints concerned lack of adequate recordkeeping practices. Examples are:
    a. S received a bill for a loan that the school said had been cancelled. The school couldn't find S a job so they refunded his $50 fee the next day and told him the loan and admission papers were cancelled; yet he later received a letter from the school stating that he had been attending school and was financially responsible.
    b. S completed his course but didn't receive his diploma. After some correspondence, they sent him a diploma in General Accounting, but did not want to issue a CPA diploma because they had lost his records.
    c. The school mistakenly enrolled a practicing attorney in a course designed for undergraduates.
    d. S mailed a reinstatement form in with a home study lesson, seeking to be officially reinstated in the course. He received grades on the lesson but no acknowledgement of receipt of the form.
    e. S's course was terminated by the school, and when he contacted them they couldn't find his records or answer his questions.

12. Seven complaints concerned instability of instructional staff. Examples are:

    a. S received excellent grades in math but was unable to continue in this area "until a new teacher was hired." None was.

    b. The school indicated that it had a complete electronics course with the necessary instructors. S found that there were several changes in instructors while he was enrolled.

    c. S spent several months in her course without a teacher.

    d. S's class had six different instructors in one year, each with a different method of teaching.

    e. The teacher was absent one to two days a week for the first seven weeks of the class.

13. Six complaints concerned misrepresentation with regard to accreditation. Examples are:

    a. The technical school managed to secure Guaranteed Student Loans for some of its students by processing them through an accredited local business school. The technical school itself was never accredited.

    b. Both the school catalog and the sales representative said the school was accredited, but neither explained the type of accreditation or that the school credits would not be accepted at other schools.

    c. Credits from the school were not transferrable even though the sales representative said they were.

    d. The school representative said the school had full accreditation as a Florida high school. S found out that this was not true.

APPENDIX B

CATEGORIES AND EXAMPLES OF POTENTIALLY ABUSIVE INSTITUTIONAL POLICIES AND PRACTICES

A. Refund Policies and Practices

1. Institution does not have a written refund policy for fees or charges collected or obligated in advance of enrollment or class attendance.

2. Written refund policy is not publicly disseminated to students and prospective students.

3. Written refund policy does not tell students how to obtain refunds.

4. Written refund policy does not provide for at least partial return of student fees or charges based on the amount of instruction the student has had the opportunity to receive.

5. Written refund policy does not specify the maximum time allowed between the receipt of a valid refund request and the issuance of a refund.

B. Advertising Practices

1. Institution uses:

   (a) advertisements in "help wanted" section of newspapers, pseudo "Talent" contests;

   (b) testimonials or endorsements by actors who did not attend the institution; or

   (c) limited time "discounts," to attract enrollees.

2. Advertising of the institution guarantees or implies that completion of an education or training program will lead to employment.

3. Institution's advertising implies that it:

   (a) has special ties or connections with employers which it does not in fact have;

   (b) offers full or partial scholarships when in fact it offers only loans or deferred tuition;

   (c) has recognized experts on its teaching faculty who in fact have no teaching responsibilities; or

   (d) offers a "superior" educational program when in fact there is no comparative evidence to support the assertion.

C. Admission Practices

1. Institution employs admissions representatives whose compensation or salary is dependent wholly or in part on direct commissions based on number of students enrolled.

2. Institution does not have a written policy governing recruiting and/or admission practices.

3. Written recruiting/admissions policy does not contain:

   (a) any prohibitions against unethical practices such as the "bait and switch" or the "negative sell";

   (b) a requirement that all prospective students talk to a representative of the institution at the school prior to enrolling; or

   (c) a requirement that all enrollees sign an agreement which describes complete costs, payment requirements, and educational services to be provided by the institution.

4. Institution does not provide remedial instruction in basic skills for students who are admitted without meeting stated admissions requirements.

D. Instructional Staff Evaluation Policies

1. Teaching competence is not included as one criterion in formal salary and/or tenure and/or rank review policies.

2. Evaluations of teaching competence do not include regular, anonymous ratings by students.

E. Disclosure in Written Documents

1. Failure to disclose any of the following in a general catalog, bulletin, or other basic information document:

   (a) name and address of school.

   (b) date of publication of the document.

   (c) school calendar including beginning and ending dates of classes and programs, holidays, and other dates of importance.

   (d) a statement of institutional philosophy.

   (e) a brief description of the school's physical facilities.

   (f) an accurate list of all courses actually offered.

   (g) an indication of when specific required courses will not be offered.

   (h) educational content of each course.

   (i) number of hours of instruction in each course and length of time in hours, weeks or months normally required for its completion.

(j) an accurate listing of faculty who currently teach.

(k) an indication of the distinction between adjunct or part-time faculty and full-time faculty.

(l) policies and procedures regarding acceptability of credits from other institutions.

(m) general acceptability by other institutions of credits earned at this institution.

(n) requirements for graduation.

(o) statement of certificates, diplomas, or degrees awarded upon graduation.

(p) statement of all charges for which a student may be held responsible.

(q) financial aid programs actually available to students.

(r) limitations on eligibility for financial aid programs.

(s) grading system.

(t) policies relating to:
    (1) tardiness
    (2) absences
    (3) make-up work
    (4) student conduct
    (5) termination
    (6) re-entry after termination

(u) student fee increases in excess of $25 that are planned within the next year.

(v) for student loan applicants:
    (1) the effective annual loan interest rate
    (2) loan repayment obligations
    (3) loan repayment procedures
    (4) time allowed for repayment
    (5) deferment or cancellation provisions, if any
    (6) collection procedures which might be applied in the event of failure to repay

2. In the event any of the following services or facilities are provided, failure to disclose their actual availability and extent:

(a) Job placement assistance or service.

(b) counseling, including for employment, academic, and/or personal problems.

(c) dining facilities.

(d) housing facilities.

(e) student parking facilities.

3. In the event the institution offers an educational program which leads to the award of degrees (or which results in credits which are transferable toward the award of degrees), failure to provide accurate descriptions of:

    (a) recognition by a state agency as meeting established educational standards for granting degrees, if there is such an agency;

    (b) the scope and sequence of required courses or subject areas in each degree program; and

    (c) policies and procedures which students must follow to transfer credits within the institution and/or to other institutions.

F. Student Orientation Procedures

1. The institution does not conduct a formal orientation program for newly enrolled students.

2. Failure to include in this orientation the following:

    (a) oral presentations or written documents prepared by students who have been previously enrolled at the institution.

    (b) instructions on how and where to voice student complaints and grievances.

    (c) information on how and where to apply for student financial aid.

G. Job Placement Services and Follow-Through

1. In the event the institution claims to have a job placement service, this service does not include the following apsects:

    (a) notification of fee charged, if this is the case.

    (b) formal training in job-seeking and job-holding skills.

    (c) contacting prospective employers to develop potential jobs.

    (d) making job interview appointments for individual students, including those seeking part-time employment and recent graduates.

2. In the event the institution claims to have a job placement service, the service is confined only to such services as distributing "Help wanted" ads from newspapers or referral to a commercial placement service.

3. The institution does not regularly collect follow-up data on the employment success of former students who did not graduate, recent graduates, and/or longer term graduates.

4. Institution does not annually calculate the rates of student attrition from each identifiable program or curriculum area and does not attempt to determine the reasons for this attrition.

H. Recordkeeping Practices

1. The institution does not maintain the following items in its individual student records:

   (a) total fees paid by the student.

   (b) courses taken and completed.

   (c) academic credits, grades earned.

   (d) financial aid amounts, including loans, if any, actually received by student and date of his/her receipt.

2. Institution does not have a written policy and actual procedures for maintaining individual student access to records for a period of at least two years following his/her departure from the institution, regardless of the operating status of the institution.

I. Turnover of Instructional Staff

1. Instructional staff are repeatedly replaced, in the same sections/courses, after instruction has begun.

2. Instructional staff are replaced in two or more sections/courses after instruction has begun.

J. Representation of Chartered, Approved, or Accredited Status

1. The institution fails to disclose to students and prospective students the fact(s) of limitation(s) or sanction(s) for noncompliance with designated standards imposed by local, state, or federal government agencies, if any exist.

2. The public representations of the institution fail to distinguish between (e.g., list separately, with appropriate explanations) institutional accreditation, specialized or professional program accreditation, state VA-approving agency course approval, and state chartering and licensing, if any are present.

K. Financial Stability

1. If the institution is not publicly-supported, it does not have the following:

   (a) an endowment or retained earnings fund to pay current operating expenses if they are not covered by student tuition receipts.

   (b) a reserve of funds sufficient to pay out tuition refunds as students make legitimate requests for them.

2. The institution's financial records and reports are not annually subjected to a certified audit.

L. Instructional Programs in Occupational, Professional Preparation Areas

1. The institution does not maintain curriculum advisory committees which include representatives of potential employers in each occupational/professional area for which instruction is offered.

2. The institution does not provide the following, when they are required for employment of graduates in an occupational/professional area:

   (a) specialized/professional program accreditation.

   (b) training in the use of basic tools and equipment.

   (c) internships and/or supervised practice on the job.

   (d) internships and/or supervised practice in simulated job situations.

   (e) instruction on topics necessary for state or professional certification of graduates.

3. The institution does not require a biannual review of the relevance and timeliness of occupational/professional curricula.

M. Instructional Equipment and Facilities in Occupational/Professional Preparation Areas

1. The institution does not maintain advisory committes on instructional equipment and facilities which include representatives of potential employers in each occupational/professional area for which instruction is offered.

2. The institution does not annually budget and expend funds for replacing worn or outdated instructional equipment in each occupational/professional area for which instruction is offered.

APPENDIX C

SUMMARY OF INSTITUTIONAL PARTICIPATION IN INSTRUMENT FIELD TEST

45 Institutions in Primary Sample

Missouri:

Kansas City

University of Missouri at Kansas City

Kansas City General Hospital and Medical Center School of Anesthesia for Nurses

Research Medical Center School of Radiologic Technology

Menorah Medical Center School of Radiologic Technology

East High School

St. Louis

St. Louis University

St. Louis College of Pharmacy

Missouri Baptist Hospital School of Medical Technology

St. Mary's Health Center School of Practical Nursing

Homer G. Phillips Hospital School of Radiologic Technology

Ranken Technical Institute

Elaine Steven Beauty College

St. Louis School of Aeronautics

Hickey School

Career Beauty School, Inc.

California:

Los Angeles

Pepperdine University

California Hospital School of X-Ray Technology

Cladic Seminary

LA-Orange Counties Blood Center of the American National Red Cross - School of Blood Bank Technology

Martin Luther King, Jr., General Hospital School of Radiologic Technology

Kaiser-Permanente School of Anesthesia for Nurses

Children's Hospital School of Medical Technology

Fran O'Bryan's Model/Actors School

Bryman School

Sawyer College of Business

Trippon Fashion Center School of Fashion Design

San Francisco

Coro Foundation

John Adams Community College Center

House of Charm

Joan Celle's Charmers School for Cocktail Waitresses

Minnesota:

Minneapolis

North Central Bible College

Mt. Sinai Hospital School of Radiologic Technology

Hennepin County Medical Center School of Medical Technology

Golden Valley Lutheran College

University of Minnesota School of Radiologic Technology

Northwest Technical Institute

Minneapolis Drafting School

Brown Institute

Minneapolis School of Anesthesia

Minneapolis Beauty College

Annie Laurie's Beauty School

St. Paul

Concordia College St. Paul

Minnesota Metropolitan State University

St. Paul - Ramsey Hospital and Medical Center School of Nursing Anesthesiology

St. John's Hospital School of X-Ray Technology

45 Institutions in Backup Sample

Missouri:

Kansas City

Kansas City Art Institute

Calvary Bible College

Penn Valley Community College

Baptist Memorial Hospital School of Medical Technology

Farrell Academy-Barber Styling and Hair Design

Kansas City School of Watchmaking

Standard Technical Institute

St. Louis

Maryville College

Barnes Hospital School of Anesthesia for Nurses

Deaconess Hospital School of Radiologic Technology

St. Louis County Hospital

St. John's Mercy Medical Center

Bailey Technical School

The Sawyer Schools, Inc.

Bryan Institute

California:

Los Angeles

- West Coast University
- University of Judaism
- Occidental Schools
- Los Angeles South West College
- Wayne Real Estate School
- American Broadcasting School, Int'l.
- Financial Schools of America
- Marinello School of Beauty
- Pacific Institute of Commercial Art
- H&R Block Co.

San Francisco

- UC Medical Center
- Pacific Heights Community College
- Children's Hospital, Medical Education Office
- Presbyterian Hospital of Pacific Medical Center
- St. Mary's Hospital School of Medical Technology

Minnesota:

Minneapolis

- Augsburg College
- Abbott-Northwestern Hospital School of Nursing
- Abbott-Northwestern Hospital School of X-Ray Technology
- St. Mary's Hospital School of Anesthesia
- Metro Medical Center School of Radiologic Technology
- Fairview Hospital School of X-Ray Technology
- Glamour Central Beauty Academy
- Maxim's Beauty College
- Minneapolis Business College
- Trowbridge Beauty College

St. Paul

- St. Paul-Ramsey Hospital & Medical Center School of Nursing
- Charles I. Miller Hospital School of X-Ray Technology
- Midway Hospital School of Radiologic Technology
- School of Associated Arts
- Instrument Flight Training, Inc.

Primary Sample Schools Which Were Declared Ineligible to Participate and Reasons Why

Schools	Reasons
Cladic Seminary 2804 Whittier Blvd. Los Angeles, CA 90023	No telephone listing
Children's Hospital School of Medical Technology 4640 Sunset Blvd. Los Angeles, CA 90054	Post-baccalaureate programs only
Trippon Fashion Center School of Fashion Design 7422 Sunset Blvd. Los Angeles, CA 90046	No telephone listing
Mt. Sinai Hospital School of Radiologic Technology 737 E. 22nd Street Minneapolis, MN 55404	School closed
St. John's Hospital School of X-Ray Technology 403 Maria Avenue St. Paul, MN 55106	School closed
Annie Laurie's Beauty School 902 W. Broadway Minneapolis, MN 55411	No telephone listing
East High School 1924 Van Brunt Blvd. Kansas City, MO	No postsecondary programs, all adult programs are secondary level

Primary Sample Schools Which Refused to Participate Prior to Scheduling an Interview and Reasons Why

Schools	Reasons
LA-Orange Counties Blood Center of the American National Red Cross--School of Blood Bank Technology 1130 S. Vermont Ave. Los Angeles, CA 90006	Declined to participate because no fees charged, did not see applicability of study Eleanor Goldstein
Sawyer College of Business 541 S. Spring Los Angeles, CA 90014	Declined to participate because of participation in five studies in past six months and lack of time--Robert Dick
St. Paul-Ramsey Hospital & Medical Center School of Nursing Anesthesiology 640 Jackson St. St. Paul, MN 55101	Declined because director out of town for full month including our interview date, and no knowledgeable substitute--Will Wheeler
Missouri Baptist Hospital School of Medical Technology 3015 N. Ballas Rd. St. Louis, MO 63131	Refused due to newness on the job and lack of time--Judy Palermo
Elaine Steven Beauty College 9953 Lewis & Clark St. Louis, MO 63136	Refused to participate, no reason--Jean Lake
Joan Celle's Charmers School for Cocktail Waitresses 645 Montgomery St. San Francisco, CA 94111	Refused after initially agreeing due to going out of town and lack of time--Joan Celle
St. Louis College of Pharmacy Euclid Ave. & Parkview Place St. Louis, MO 63110	Refused due to being "sick of forms"--just completed two accreditation visits, and not sure of legality of releasing names according to MO state law--Byron A. Barnes
St. Mary's Health Center School of Practical Nursing 6420 Clayton Rd. St. Louis, MO 63117	Refused, not interested at this time--Mrs. Fendler
Kansas City General Hospital and Medical Center School of Anesthesia for Nurses 24th and Cherry Streets Kansas City, MO 64108	Refused, no reason given--Dr. Nina Beatty
Hickey School 6710 Clayton Rd. St. Louis, MO 63117	Refused because just assumed presidency, school in state of flux in policies, feels input to data would be unfair and unhelpful--John Gosule

Backup Sample Schools Which Were Declared Ineligible to Participate and Reasons Why

Schools	Reasons
Occidental Schools 840 Seward Street Hollywood, CA 90038	No telephone listing
Children's Hospital, Medical Education Office 3700 California St. San Francisco, CA 94119	Post-doctorate programs only
St. Mary's Hospital School of Medical Technology 2200 Hayes St. San Francisco, CA 94117	School closed
Charles I. Miller Hospital School of X-Ray Technology 125 W. College Avenue St. Paul, MN 55102	School closed

Eligible Schools Which Refused to Participate After Scheduling an Interview and Reasons Why

Schools	Reasons
Pacific Institute of Commercial Art 127 Silver Lake Blvd. Los Angeles, CA 90026 (Backup)	No time -- Isabella Armijo
Penn Valley Community College 3201 Southwest Trafficway Kansas City, MO 64111 (Backup)	President was being replaced, administration in a state of flux -- Dr. Thomas Law
Baptist Memorial Hospital School of Medical Technology 6601 Rockhill Road Kansas City, MO 64131 (Backup)	Too busy -- Dr. Ost
The Bryan Institute 5841 Chippewa Avenue St. Louis, MO 63109 (Backup)	A chain school, participation not approved by corporate headquarters -- Harry Dickerson

APPENDIX D

INSTITUTIONS PARTICIPATING IN INSTRUMENT FIELD TEST AND NAMES OF CONTACT PERSONS

School Type[1]	School Name & Address	N of Students	Founded in	Accrediting Agency
01115	John Adams Community College Center 1860 Hayes St. San Francisco, CA 94117 --Mr. Maxwell Gillette, Director	1,298	1856	Western Association of Schools and Colleges
01412	House of Charm 157 Maiden Lane San Francisco, CA 95108 --Mrs. Nerice Moore, Director	91	1942	none
02344	Pepperdine University 1121 West 79th St. Los Angeles, CA 90044 --Mr. Robert Fraley, Dean of Admissions	649	1937	Western Association of Schools and Colleges
04344	Concordia College St. Paul 275 N. Syndicate St. St. Paul, MN 55104 --Dr. Luther Mueller, Acting President	272	1893	North Central Association of Colleges and Secondary Schools
03211	Abbott-Northwestern Hospital School of X-Ray Technology 810 E. 27th St. Minneapolis, MN 55407 --Mr. Walter Rasula, Director	9	1965	Joint Review Committee for American College of Radiology of AMA
03121	University of Minnesota, School of Radiologic Technology 412 Union Street SE Minneapolis, MN 55455 --Mrs. Pat Skundberg, Director of Radiologic Tech. Program	25	1851	North Central Association of Colleges and Secondary Schools; and AMA

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[1] For an explanation of school type codes, see Appendix I, coding for bytes 1-5 of school ID number.

03424	Brown Institute 3123 E. Lake St. Minneapolis, MN 55406 --Mr. Richard Brown, President	748	1946	National Association of Trade and Technical Schools
03412	Trowbridge Beauty College 17 Upper Midway Bldg. Minneapolis, MN 55405 --Mr. Don Trowbridge, President	37	1950	Cosmetology Accrediting Commission
03111	Hennepin County Medical Center School of Medical Technology 7th & Park, S. Minneapolis, MN 55415 --Ms. Mary Ann Smalley, Director	12	1922	National Accrediting Agency for Clinical Lab Science
03211	Fairview Hospital School of X-Ray Technology 2312 S. 6th St. Minneapolis, MN 55404 --Mr. Luther Linn, Director	7	1949	Joint Review Committee for American College of Radiology of AMA
03211	Minneapolis School of Anesthesia 916 E. 15th St. Minneapolis, MN 55404 --Ms. Sandra Kilde, Director	19	1928	American Association of Nurse Anesthetists
02211	Kaiser-Permanente School of Anesthesia for Nurses 4867 Sunset Blvd. Los Angeles, CA 90027 --Ms. Joyce Kelly, Director	8	1972	American Association of Nurse Anesthetists
02211	California Hospital School of X-Ray Technology 1414 S. Hope St. Los Angeles, CA 90015 --Mr. Bill Listek, Chief of Radiology	7	1940	Joint Review Committee for American College of Radiology of AMA

06111	Homer G. Phillips Hospital School of Radiologic Technology 2601 N. Whittier St. Louis, MO 63113 --Dr. Beauvoir Edmond, Director, Dept. of Radiology	11	1948	Council on Medical Education of AMA
05211	Research Medical Center School of Radiologic Technology 2316 East Meyer Boulevard Kansas City, MO 64132 --Mr. LeRoy Reimer, Instructor-Director	8	1934	Joint Committee of American College of Radiology, AMA
06343	Maryville College 13550 Conway Road St. Louis, MO 63141 --Dr. James Stam, Vice-President and Academic Dean	228	1872	North Central Association
06214	Ranken Technical Institute 4431 Finney Ave. St. Louis, MO 63113 --Mr. Jim Young, Assistant Director	339	1907	National Association of Trade and Technical Schools
06345	St. Louis University 221 N. Grand Blvd. St. Louis, MO 63103 --Dr. Gerald Baltz, Assistant to the President	1,393	1818	North Central Association
05311	Menorah Medical Center School of Radiologic Technology 4949 Rockhill Road Kansas City, MO 64110 --Mrs. Mary Kay Boswell, Student Coordinator	2	1947	Council on Medical Education of AMA

02111	Martin Luther King, Jr., General Hospital School of Radiologic Technology 12021 S. Wilmington Ave. Los Angeles, CA 90059 --Mr. Vincent Fenty, Director	7	1948 (Compton Community College)	Western Association of Schools and Colleges
03413	Minneapolis Drafting School 3407 Chicago Ave. Minneapolis, MN 55407 --Mr. Robert X. Casserly, President	162	1961	National Association of Trade and Technical Schools
03412	Minneapolis Beauty College 5011 Ewing Ave., S. Minneapolis, MN 55410 --Mr. Jay Schreur, Director	67	1938	Cosmetology Accrediting Commission
06212	Barnes Hospital School of Anesthesia for Nurses Barnes Hospital Plaza St. Louis, MO 63110 --Miss Helen Ogle, Director	32	1932	American Association of Nurse Anesthetists
05145	University of Missouri at Kansas City 5100 Rockhill Road Kansas City, MO 64110 --Dr. Gary Widmar, Dean of Students	2,098	1929 (University of Kansas City)	North Central Association
06412	Career Beauty School, Inc. 3546 S. Grand St. Louis, MO 63118 --Mr. Frederick Ford, President	50	1960	Cosmetology Accrediting Commission
03343	North Central Bible College 910 Elliot Avenue Minneapolis, MN 55404 --Dr. Don Argue, Dean of the College	246	1930	Accrediting Association of Bible Colleges

03422	Northwest Technical Institute[1] 7600 Highway 7 Minneapolis, MN 55426 --Mr. Norris Nelson, President	57	1957	National Association of Trade and Technical Schools
04144	Minnesota Metropolitan State University[1] 121 Metro Square, 7th & Robert St. Paul, MN 55101 --Dr. James Deegan, Director, Research and Development	650	1971	North Central Association
03323	Golden Valley Lutheran College[1] 6125 Olson Highway Minneapolis, MN 55422 --Mr. Bernt C. Opsal, President	314	1919 (Bible School St. Paul)	none
01211	Coro Foundation[1] 149 Ninth St. San Francisco, CA 94103 --Mr. Richard M. Buttrick, Executive Director, Northern California Center	12	1941	none
05412	Kansas City School of Watchmaking[1] 4528 Main Kansas City, MO 64111 --Dr. Warner Johnson, Vice-Pres. of Parent Corporation Gem City College Quincy, IL 62301	35	1937	none
02413	Marinello School of Beauty[1] 716 S. Broadway Los Angeles, CA 90014 --Mr. Meyer Luskin, President of Parent Corporation Scope Industries 4250 Wilshire Blvd Los Angeles, CA	150	1905	Cosmetology Accrediting Commission

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[1] Did not participate in ESQ field test.

02411	Fran O'Bryan's Model/Actors School[1] 600 S. San Vicente Blvd. Los Angeles, CA 90048 --Mrs. Fran O'Bryan, President	12	1950	none
02414	Bryman School[1] 1017 Wilshire Blvd. Los Angeles, CA 90017 --Mr. Dick Miller, Corporate Director of Accreditations and Approvals Bryman Schools, Inc. 12340 Santa Monica Blvd. Los Angeles, CA 90017	293	1960	National Association of Trade and Technical Schools.
06411	St. Louis School of Aeronautics[1] Box 924 Bridgeton, MO 63044 -- Mr. Dave Langley, Co-Owner		(Mark Aero School)	Federal Aviation Administration
06424	Bailey Technical School[1] 3750 Lindell Blvd. St. Louis, MO 63108 --Mr. Dick Freund, Corporate Director of Placement and Accreditation ITT Educational Services 5610 Crawfordsville Road Indianapolis, Ind. 46224	798	1936	National Association of Trade and Technical Schools
02414	H & R Block Co.[1] 5508 Sepulveda Culver City, CA 90230 --Mr. William T. Ross, Corporate Vice President of Administrative Operations H & R Block, Inc. 4410 Main Street Kansas City, MO 64111	146	1964	none

[1] Did not participate in ESQ field test.

APPENDIX E

INSTITUTION CONTACT LETTER

AIR
AMERICAN INSTITUTES FOR RESEARCH
IN THE BEHAVIORAL SCIENCES
P.O. Box 1113, 1791 Arastradero Rd., Palo Alto, Ca. 94302 ● 415/493-3550

28 April 1976

Chief Executive Officer
Forty-five Field Test Institutions
Missouri, Minnesota, California

Dear Colleague:

The American Institutes for Research (AIR) is currently conducting a project for the U.S. Office of Education (USOE) which we feel is potentially of great value and significance to all types of postsecondary schools. We are requesting your help with this effort.

Pressure for the development of mechanisms to protect consumers of postsecondary education has been increasing from all directions, as you are no doubt aware. Consumer protection has been at least a partial impetus behind such things as: the recent Congressional hearings and proposed legislation on protecting students from school abuses; the current Federal Trade Commission proposal to tighten regulation of proprietary (profit-seeking) schools; stricter regulations for eligibility of institutions for Guaranteed Student Loan Program funds; the Veterans Administration's new requirements for disclosure of occupational course placement rates; and numerous state and federal conferences on the issue of educational consumer protection in higher education. It is clear that governmental impact upon school practices is going to grow more and more direct--*unless* voluntary efforts at identifying and reducing abusive practices begin to provide more satisfactory results.

Basically, the AIR project staff is attempting to identify what *types* of information are most useful in protecting the consumer from the occasional abusive practice of a postsecondary school, and how such information can be provided by postsecondary schools with the least inconvenience or obtrusiveness. If students can better exercise *informed consumer choice*, we hope the free market mechanism rather than increased *governmental control* can force an end to abusive practice.

We would like to ask your cooperation in two ways:

1) I would appreciate it if you could arrange to send me a copy of your most recent catalog or bulletin, along with any other documents *which are available to the general public* related to your school's: refund policies and practices, advertising practices (including sample copy), initial student admission practices, faculty/staff evaluation policies, public disclosure policies, student orientation practices (for new students), job placement services, policies for maintenance of student records, licensed/approved/accredited status, instructional program/curriculum evaluation policies, instructional facilities evaluation policies, and practices for follow-up of graduates and/or students who terminate their enrollment before graduation.

I would then like to set up an appointment, lasting perhaps two hours, with you and/or other appropriate members of your staff. The purpose of this meeting would be to supplement the understanding of your school's student consumer protection policies and practices which we gained from our review of the documents you have supplied. Our contract with USOE authorizes us to pay a $50 honorarium as partial reimbursement for the time provided by you and your staff in this regard.

2) I would like to secure your permission to administer a questionnaire by mail to all of your currently enrolled first year students. This questionnaire is designed to sample student awareness of the consumer protection policies of their school; I have attached a copy for your perusal. To administer this questionnaire, we will need a listing of the names and home addresses of this group. Our contract with USOE also allows us to reimburse all costs associated with the construction of this list. Special care will be taken to insure the anonymity of all student responses.

Summaries of the student questionnaire results for your school and for all other schools participating in this study would be made available to you; we hope that these might provide valuable to you in your school's self-assessment efforts. These summaries and any other reports emanating from this study will contain only aggregated data so that neither you nor your school will be identified. We are convinced these data will prove valuable to us in our efforts to protect both students and postsecondary schools, as well as society, from the effects of practices which abuse the educational consumer.

If you have any questions, please phone me at (415) 493-3550 or the USOE Project Officer, Dr. William Green, at (202) 245-7884. A member of my staff will be calling you in about two weeks to follow up on this request. By this time, I hope we will have had a chance to review your school's catalog and other public information documents.

Sincerely yours,

Steven M. Jung

Steven M. Jung, Ph.D.
Senior Research Scientist

Enclosure: Enrolled Student Questionnaire

APPENDIX F

STUDENT CONTACT LETTERS

Initial Letter:

Dear Student:

The American Institutes for Research (a non-profit research organization) is conducting a study, funded by the United States Office of Education, to suggest improvements in protection of postsecondary students. One possible improvement method we have identified is to periodically survey students who are enrolled in institutions which are eligible to participate in federal government financial assistance programs.

The school named on the cover of the enclosed questionnaire has been selected to assist us in this survey. As part of its participation, the school has allowed us to request your help. Please complete this questionnaire and return it to National Computer Systems, Minneapolis, Minnesota, in the postage paid return envelope, even if you are no longer a student at the named school. It will take only about 10 minutes of your time to complete; I hope the benefits of your responses to future students will make this very well worth your effort.

Although it is described on the cover of the questionnaire, I want to point out again that your responses will be kept completely confidential. Nevertheless, should you feel reluctant to answer any item, just omit that item.

I sincerely appreciate your assistance in this study.

Cordially,

Steven M Jung

Steven M. Jung
Project Director

Enclosures: Enrolled Student Questionnaire
Postage Paid Return Envelope

Second Letter to Initial Non-Respondents:

Dear Student:

Two weeks ago, I mailed you a questionnaire which is part of a United States Office of Education study to suggest improvements in the protection of postsecondary students. To date, we have not received the completed questionnaire from you. We need your participation even if you are no longer a student at the institution named on the cover of the questionnaire.

If you have already completed and returned the first questionnaire I sent, please disregard this letter. If you have not yet completed it, perhaps because it was misplaced, I am enclosing a second copy. Please complete it and return it to National Computer Systems in Minneapolis, Minnesota, in the postage paid return envelope; it will only take about 10 minutes.

I sincerely appreciate your assistance in this study.

Cordially,

Steven M Jung

Steven M. Jung
Project Director

Enclosures: Enrolled Student Questionnaire
Postage Paid Return Envelope

APPENDIX G

INSTITUTIONAL REPORT FORM INTERVIEW GUIDE AND SUMMARY OF EDITED FIELD TEST RESPONSES

Occupational Training Institutions: N = 25

Degree Granting Institutions: N = 37

All Institutions: N = 37

Item codes used in summary of field test results:

0 = "No" response marked

1 = "Yes" response marked

8 = item intentionally skipped according to branching instructions

9 = item omitted or marked as not applicable

Occupational Training Institutions								Degree Granting Institutions								All Institutions							
N				%				N				%				N				%			
0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9
8	17	.	.	32	68	.	.	.	12	.	.	.	100	.	.	8	29	.	.	22	78	.	.
25	.	.	.	100	.	.	.	10	2	.	.	33	17	.	.	35	2	.	.	95	4	.	
22	3	.	.	88	12	.	.	3	9	.	.	25	75	.	.	25	12	.	.	68	32	.	.
22	3	.	.	88	12	.	.	9	3	.	.	75	25	.	.	31	6	.	.	84	16	.	.
23	2	.	.	92	8	.	.	9	3	.	.	75	25	.	.	32	5	.	.	87	14	.	.
3	15	7	.	12	60	28	.	.	12	.	.	.	100	.	.	3	27	7	.	8	73	19	.
1	14	10	.	4	56	40	.	.	12	.	.	.	100	.	.	1	26	10	.	3	70	27	.
6	9	10	.	24	36	40	.	.	12	.	.	.	100	.	.	6	21	10	.	16	57	27	.
3	12	10	.	12	48	40	.	.	12	.	.	.	100	.	.	3	24	10	.	8	65	27	.
6	9	10	.	24	36	40	.	1	11	.	.	8	92	.	.	7	20	10	.	19	54	27	.

Refund Policies and Practices

1. Does this institution require students to pay or otherwise obligate to pay any of the following fees or charges in advance of enrollment or class attendance? Fill in one oval for each option.

	No	Yes	
1a	○	○	Resident tuition (e.g., in-state or region).
1b	○	○	Non-resident tuition (e.g., out-of-state tuition).
1c	○	○	Room and board charges or deposits.
1d	○	○	Application or registration fees in excess of $50.
1e	○	○	Other required student fees in excess of $50.

If you filled in "no" to all the options above, skip the following three items and go on to page 4, Advertising Practices.

2. Does this institution have a written refund policy regarding all those fees for which "yes" was checked in item 1? Fill in one oval.

	No	Yes
2a	○	○

If you filled in "no" to item 2 above, skip the following two items and go on to page 4, Advertising Practices.

3. How is the written refund policy made available to students? Fill in one oval for each option.

	No	Yes	
3a	○	○	It is made available for public inspection at the institution.
3b	○	○	It is printed in the school's general catalog or bulletin.
3c	○	○	It is distributed to all enrolled students.
3d	○	○	It is distributed to all prospective students.

Advertising Practices

1. Does this institution use the following advertising techniques in attracting applicants for admission? Fill in one oval for each option.

Occupational Training Institutions								Degree Granting Institutions								All Institutions											
N				%				N				%				N				%							
0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9		No	Yes	
25	.	.	.	100	.	.	.	12	.	.	.	100	.	.	.	37	.	.	.	100	.	.	.	1a	○	○	Classified ads in the "Help Wanted" section of the newspaper, not for employed positions at the institution, but to obtain "leads on potential students.
25	.	.	.	100	.	.	.	11	1	.	.	92	8	.	.	36	1	.	.	97	3	.	.	1b	○	○	Competitions or contests designed only to stimulate enrollments.
25	.	.	.	100	.	.	.	12	.	.	.	100	.	.	.	37	.	.	.	100	.	.	.	1c	○	○	Testimonials or endorsements by persons who did not, in fact, attend this institution.
24	1	.	.	96	4	.	.	12	.	.	.	100	.	.	.	36	1	.	.	97	3	.	.	1d	○	○	Offers of limited time "discounts" on tuition charges, room and board charges, etc.

2. Does this institution make the following statements in any of its advertising? Fill in one oval for each option.

Occupational Training Institutions								Degree Granting Institutions								All Institutions											
N				%				N				%				N				%							
0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9		No	Yes	
25	.	.	.	100	.	.	.	12	.	.	.	100	.	.	.	37	.	.	.	100	.	.	.	2a	○	○	Completing the education or training offered at this institution guarantees employment.
20	5	.	.	80	20	.	.	11	1	.	.	92	8	.	.	31	6	.	.	84	16	.	.	2b	○	○	Completing the education or training offered at this institution is likely to lead to employment.
25	.	.	.	100	.	.	.	12	.	.	.	100	.	.	.	36	1	.	.	97	3	.	.	2c	○	○	There are ties or connections between this institution and specific employers which will result in special employment considerations for graduates, when in fact there are no such ties.
25	.	.	.	100	.	.	.	12	.	.	.	100	.	.	.	37	.	.	.	100	.	.	.	2d	○	○	Scholarships or other forms of no-cost financial assistance are available, when in fact they have not been awarded during the past year.
25	.	.	.	100	.	.	.	12	.	.	.	100	.	.	.	37	.	.	.	100	.	.	.	2e	○	○	The educational program is superior to the educational program offered at competing institutions.
25	.	.	.	100	.	.	.	11	1	.	.	92	8	.	.	36	1	.	.	97	3	.	.	2f	○	○	Recognized experts or other types of well-known persons are on the teaching faculty, when in fact they have no teaching responsibilities.

3. Does a responsible administrative officer of this institution review advertising copy before it is released? Fill in one oval for each option.

Occupational Training Institutions								Degree Granting Institutions								All Institutions											
N				%				N				%				N				%							
0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9		No	Yes	
.	14	.	11	.	56	.	44	.	12	[illegible]	.	.	100	.	.	.	26	.	11	.	70	.	30	3a	○	○	Some or most of it.
1	13	.	11	4	52	.	44	.	12	.	[illegible]	.	100	.	.	1	25	.	11	3	68	.	30	3b	○	○	All of it.

Occupational Training Institutions								Degree Granting Institutions								All Institutions							
N				%				N				%				N				%			
0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9
23	2	.	.	92	8	.	.	11	1	.	.	92	8	.	.	34	3	.	.	92	8	.	.
.	2	23	.	.	8	92	.	.	1	11	.	.	8	92	.	.	3	34	.	.	8	92	.
.	2	23	.	.	8	92	.	.	1	11	.	.	8	92	.	.	3	34	.	.	8	92	.
1	1	23	.	4	4	92	.	1	.	11	.	8	.	92	.	2	1	34	.	5	3	92	.
13	12	.	.	52	48	.	.	5	7	.	.	42	58	.	.	18	19	.	.	49	51	.	.
12	1	12	.	48	4	48	.	4	3	5	.	33	25	42	.	16	4	17	.	43	11	46	.
2	11	12	.	8	44	48	.	6	1	5	.	50	8	42	.	8	12	17	.	22	32	46	.
6	7	2	.	24	28	43		6	1	5	.	50	8	42	.	12	8	17	.	32	22	46	.
17	6	2	.	68	24	8	.	3	7	2	.	25	58	17	.	20	13	4	.	54	35	11	.

Admission Practices

1. Does this institution employ admissions representatives whose compensation or salary is based wholly or in part on commissions? Fill in one oval.

	No	Yes
1a	0	0

If you filled in "No" to item 1 above, skip item 2 and go on to item 3.

2. How are these commissions calculated? Fill in one oval for each option.

	No	Yes	
2a	0	0	They are based on the number of students enrolled.
2b	0	0	They are based on the number of students enrolled who actually attend classes.
2c	0	0	They are based on the number of students enrolled who graduate.

3. Does this institution have a written policy which governs recruiting and/or admissions practices? Fill in one oval.

	No	Yes
3a	0	0

If you filled in "no" to item 3 above, skip item 4 and go on to item 5.

4. Does this institution's written recruiting and/or admissions policy specify the following items? Fill in one oval for each option.

	No	Yes	
4a	0	0	A code of ethics which prohibits certain recruiting/admissions practices.
4b	0	0	A requirement that prospective students talk to a staff member, at the institution, prior to enrolling.
4c	0	0	The completion of a signed enrollment agreement which describes costs, payment requirements, and educational services to be provided by the institution.

5. Does this institution have a policy of regularly admitting students who do not meet stated admissions requirements? Fill in one oval.

	No	Yes	This institution has no stated admissions requirements.
5a	0	0	0

If you filled in "no" or "no stated admissions requirements" to item 5 above, skip the following item and go on to page 7, Instructional Staff.

6. **For students who do not meet stated admissions requirements, but are admitted under a special admissions policy, are the following courses provided? Fill in one oval for each option.**

	No	Yes		Occupational Training Institutions								Degree Granting Institutions								All Institutions							
				N				%				N				%				N				%			
				0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9
6a	0	0	**Courses or sections offering remedial instruction in basic English.**	4	2	19	.	16	8	76	.	3	4	5	.	25	33	42	.	7	6	24	.	19	16	65	.
6b	0	0	**Courses or sections offering remedial instruction in basic mathematics.**	4	2	19	.	16	8	76	.	5	2	5	.	42	17	42	.	9	4	24	.	24	11	65	.
6c	0	0	**Special academic tutoring programs offering remedial instruction related to students' needs.**	2	4	19	.	8	16	76	.	.	7	5	.	.	58	42	.	2	11	24	.	5	30	65	.

	Occupational Training Institutions								Degree Granting Institutions								All Institutions							
	N				%				N				%				N				%			
	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9
1a	5	18	2	.	20	72	8	.	.	12	.	.	.	100	.	.	5	30	2	.	14	81	5	.
2a	3	21	1	.	12	84	4	.	3	9	.	.	25	75	.	.	6	30	1	.	16	81	3	.
2b	13	11	1	.	52	44	4	.	5	7	.	.	42	58	.	.	18	18	1	.	49	49	3	.
2c	14	10	1	.	56	40	4	.	4	8	.	.	33	67	.	.	18	18	1	.	49	49	3	.
2d	22	2	1	.	88	8	4	.	11	1	.	.	92	8	.	.	33	3	1	.	89	8	3	.
2e	19	5	1	.	76	20	4	.	8	4	.	.	67	33	.	.	27	9	1	.	73	24	3	.
2f	.	2	1	22	.	8	4	88	.	1	.	11	.	8	.	92	.	3	1	33	.	8	3	89
3a	2	9	14	.	8	36	56	.	1	7	4	.	8	58	33	.	3	16	18	.	8	43	49	.
4a	3	7	15	.	12	28	60	.	2	5	5	.	17	42	42	.	5	12	20	.	14	32	54	.
4b	3	7	15	.	12	28	60	.	1	6	5	.	8	50	42	.	4	13	20	.	11	35	54	.
4c	1	9	15	.	4	36	60	.	1	6	5	.	8	50	42	.	2	15	20	.	5	41	54	.
4d	4	4	15	2	16	16	60	8	1	6	5	.	8	50	42	.	5	10	20	2	14	27	54	5

Instructional Staff

1. Is teaching competence (no matter how it is evaluated) included as one criterion in the formal salary and/or tenure and/or rank review policies of this institution? Fill in one oval.

	No	Yes		
1a	○	○	○	This institution has no formal salary/tenure/rank review policies.

2. Is teaching competence evaluated by the following groups at this institution? Fill in one oval for each option.

	No	Yes	
2a	○	○	By administrative staff.
2b	○	○	By other faculty of the same department or program.
2c	○	○	By students.
2d	○	○	By graduates.
2e	○	○	By self-ratings.
2f		○	Other, please describe on the last page of the questionnair

If you filled in "no" to "By students" in item 2 above, skip the following two items and go on to page 8, Disclosure in Written Documents.

3. Are student evaluations of teaching faculty members conducted on a regular basis (e.g., yearly, at the end of each course)? Fill in one oval

	No	Yes
3a	○	○

If you filled in "no" to item 3 above, skip the following item and go on to page 8, Disclosure in Written Documents.

4. Does the student evaluation system include the following provisions? Fill in one oval for each option.

	No	Yes	
4a	○	○	Anonymous student responding.
4b	○	○	Objective student responding (for example on machine scored answer sheets).
4c	○	○	Evaluations of all full-time faculty members.
4d	○	○	Evaluations of all part-time faculty members.

Disclosure in Written Documents

1. Does this institution disclose the following information in its general catalog, bulletin, or basic public information document or a combination of these? Fill in one option for each oval.

Occupational Training Institutions								Degree Granting Institutions								All Institutions											
N				%				N				%				N				%							
0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9		No	Yes	
1	23	.	1	4	92	.	4	.	12	.	.	.	100	.	.	1	35	.	1	3	95	.	3	*1a*	○	○	Name and address of school.
15	10	.	.	60	40	.	.	3	9	.	.	25	75	.	.	18	19	.	.	49	51	.	.	*1b*	○	○	Date of publication of the document.
14	11	.	.	56	44	.	.	.	11	.	1	.	92	.	8	14	22	.	1	38	60	.	3	*1c*	○	○	School calendar including beginning and ending dates of classes and programs, holidays, and other dates of importance.
9	16	.	.	36	64	.	.	.	12	.	.	.	100	.	.	9	28	.	.	24	76	.	.	*1d*	○	○	A statement of institutional philosophy and program objectives.
9	16	.	.	36	64	.	.	.	11	.	1	.	92	.	8	9	27	.	1	24	73	.	3	*1e*	○	○	A brief description of the school's physical facilities.
5	20	.	.	20	80	.	.	1	10	.	1	8	83	.	8	6	30	.	1	16	81	.	3	*1f*	○	○	An accurate list of all courses actually offered.
13	4	.	8	52	16	.	32	9	1	.	2	75	8	.	17	22	5	.	10	60	14	.	27	*1g*	○	○	An indication of when specific courses will not be offered.
8	17	.	.	32	68	.	.	1	10	.	1	8	83	.	8	9	27	.	1	24	73	.	3	*1h*	○	○	Educational content of each course.
5	20	.	.	20	80	.	.	2	9	.	1	17	75	.	8	7	29	.	1	19	78	.	3	*1i*	○	○	Number of hours of instruction in each course and length of time in hours, weeks or months normally required for its completion.
16	9	.	.	64	36	.	.	3	9	.	.	25	75	.	.	19	18	.	.	51	49	.	.	*1j*	○	○	An accurate listing of faculty who currently teach.
17	2	.	6	68	8	.	24	7	5	.	.	58	42	.	.	24	7	.	6	65	19	.	16	*1k*	○	○	An indication of the distinction between adjunct or part-time faculty and full-time faculty.
14	7	.	4	56	28	.	16	3	9	.	.	25	75	.	.	17	16	.	4	46	43	.	11	*1l*	○	○	Policies and procedures regarding acceptability of credits from other institutions.
18	5	.	2	72	20	.	8	6	6	.	.	50	50	.	.	24	11	.	2	65	30	.	5	*1m*	○	○	General acceptability by other institutions of credits earned at this institution.
2	23	.	.	8	92	.	.	.	12	.	.	.	100	.	.	2	35	.	.	5	95	.	.	*1n*	○	○	Requirements for graduation.
6	19	.	.	24	76	.	.	.	12	.	.	.	100	.	.	6	31	.	.	16	84	.	.	*1o*	○	○	Statement of certificates, diplomas, or degrees awarded upon graduation.
4	19	1	1	16	76	4	4	.	12	.	.	.	100	.	.	4	31	1	1	11	84	3	3	*1p*	○	○	Statement of all charges for which a student may be held responsible.
12	10	.	3	48	40	.	12	.	12	.	.	.	100	.	.	12	22	.	3	32	60	.	8	*1q*	○	○	Financial aid programs actually available to students.
18	6	.	1	72	24	.	4	3	9	.	.	25	75	.	.	21	15	.	1	57	41	.	3	*1r*	○	○	Limitations on eligibility for financial aid programs.
7	18	.	.	28	72	.	.	.	12	.	.	.	100	.	.	7	30	.	.	19	81	.	.	*1s*	○	○	Grading system.

Occupational Training Institutions								Degree Granting Institutions								All Institutions									No	Yes	Policies relating to:
N				%				N				%				N				%							
0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9				
11	13	.	1	44	52	.	4	4	7	.	1	33	58	.	8	15	20	.	2	41	54	.	5	*1t*	○	○	Tardiness
7	17	.	1	28	68	.	4	2	9	.	1	17	75	.	8	9	26	.	2	24	70	.	5	*1u*	○	○	Absences
8	15	.	2	32	60	.	8	3	8	.	1	25	67	.	8	11	23	.	3	30	62	.	8	*1v*	○	○	Make-up work
8	16	.	1	32	64	.	4	3	8	.	1	25	67	.	8	11	24	.	2	30	65	.	5	*1w*	○	○	Student conduct
11	14	.	.	44	56	.	.	1	11	.	.	8	92	.	.	12	25	.	.	32	68	.	.	*1x*	○	○	Termination
17	7	.	1	68	28	.	4	4	8	.	.	33	67	.	.	21	15	.	1	57	40	.	3	*1y*	○	○	Re-entry after termination

2. Does the institution disclose information about the following conditions or services in its general catalog, bulletin, or basic public information document? Fill in one oval for each option.

Occupational Training Institutions								Degree Granting Institutions								All Institutions									No	Yes	The conditions or services mentioned do not exist at this institution.	
N				%				N				%				N				%								
0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9					
12	11	2	.	48	44	8	.	2	6	4	.	17	50	33	.	14	17	6	.	38	46	16	.	*2a*	○	○	○	Any standard limitations on employment opportunities after training (e.g., medical or health requirements, licensing, apprenticeship, age, experience, further training by employer, etc.).
4	1	20	.	16	4	80	.	2	1	9	.	17	8	75	.	6	2	29	.	16	5	78	.	*2b*	○	○	○	Lack of specialized or professional course accreditation at this institution if such is required for employment in any occupation or profession for which this institution offers training.
																												Accurate descriptions of the availability and extent of the following student services:
10	7	8	.	40	28	32	.	1	10	1	.	8	83	8	.	11	17	9	.	30	46	24	.	*2c*	○	○	○	Job placement
8	5	12	.	32	20	48	.	2	9	1	.	17	75	8	.	10	14	13	.	27	38	35	.	*2d*	○	○	○	Counseling
4	11	10	.	16	44	40	.	2	7	3	.	17	58	25	.	6	18	13	.	16	49	35	.	*2e*	○	○	○	Dining facilities
5	6	14	.	20	24	56	.	1	7	4	.	8	58	33	.	6	13	18	.	16	35	49	.	*2f*	○	○	○	Housing
7	8	10	.	28	32	40	.	4	6	2	.	33	50	17	.	11	14	12	.	30	38	32	.	*2g*	○	○	○	Parking facilities
																												Accurate descriptions of the following institutional conditions or procedures regarding the award of degrees:
.	.	.	25	.	.	.	.	2	5	.	5	17	42	.	42	2	5	.	30	5	14	8	81	*2h*	○	○	○	Recognition by a state agency as meeting established educational standards for granting degrees.
.	.	.	25	.	.	.	.	1	6	.	5	8	50	.	42	1	6	.	30	3	16	8	81	*2i*	○	○	○	Scope and sequence of required courses in each degree program.
.	.	.	25	.	.	.	.	1	5	1	5	8	42	8	42	1	5	1	30	3	14	3	81	*2j*	○	○	○	Policies and procedures regarding transfer between departments and/or colleges within the institution.

Occupational Training Institutions								Degree Granting Institutions								All Institutions							
N				%				N				%				N				%			
0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9
18	6	.	1	72	24	.	4	3	8	.	1	25	67	.	8	21	14	.	2	57	38	.	5
2	4	18	1	8	16	72	4	.	8	3	1	.	67	25	8	2	12	21	2	5	32	57	5
15	10	.	.	60	40	.	.	1	11	.	.	8	92	.	.	16	21	.	.	43	57	.	.
2	7	14	2	8	28	56	8	1	10	1	.	8	83	8	.	3	17	15	2	8	46	41	5
2	7	14	2	8	28	56	8	.	11	1	.	.	92	8	.	2	18	15	2	5	49	41	5
2	7	14	2	8	28	56	8	1	10	1	.	8	83	8	.	3	17	15	2	8	46	41	5
3	5	14	3	12	20	56	12	.	11	1	.	.	92	8	.	3	16	15	3	8	43	41	8
7	1	14	3	28	4	56	12	6	5	1	.	50	42	8	.	13	6	15	3	35	16	41	8
5	3	14	3	20	12	56	12	1	10	1	.	8	83	8	.	6	13	15	3	16	35	41	8
2	6	14	3	8	24	56	12	7	4	1	.	58	33	8	.	9	10	15	3	24	27	41	8

3. Are increases in any student fees in excess of $25 currently planned within the next year? Fill in one oval.

	No	Yes
3a	○	○

If you filled in "no" to item 3 above, skip item 4 and go on to item 5.

4. Are the planned fee increases disclosed in writing to all students and prospective enrollees to whom they might apply? Fill in one oval.

	No	Yes
4a	○	○

5. Does this institution have a student loan program (or programs), including National Direct Student Loans, federally or state-insured loans, bank loans, or loans directly from the institution (including deferred tuition payment plans)? Fill in one oval.

	No	Yes
5a	○	○

If you filled in "no" to item 5 above, skip the following item and go on to page 10 Student Orientation.

6. Do all applicants for student loans (excluding short-term or emergency loans) receive printed documents which disclose the following? Fill in one oval for each option.

	No	Yes	
6a	○	○	The effective annual loan interest rate.
6b	○	○	Loan repayment obligations.
6c	○	○	The process for repayment of the loan.
6d	○	○	The length of time required for repayment.
6e	○	○	The procedure for renegotiating the repayment schedule for the loan.
6f	○	○	Procedures for deferrment or cancellation of portions of the loan, if necessary.
6g	○	○	Procedures for loan collection which will be used in the event of failure to repay.

Occupational Training Institutions								Degree Granting Institutions								All Institutions							
N				%				N				%				N				%			
0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9
2	23	.	.	8	92	.	.	.	12	.	.	.	100	.	.	2	35	.	.	5	95	.	.
7	16	2	.	28	64	8	.	.	12	.	.	.	100	.	.	7	28	2	.	19	76	5	.
17	4	2	2	68	16	8	8	3	9	.	.	25	75	.	.	20	13	2	2	54	35	5	5
5	18	2	.	20	72	8	.	3	9	.	.	25	75	.	.	8	27	2	.	22	73	5	.
7	15	2	1	28	60	8	4	3	9	.	.	25	75	.	.	10	24	2	1	27	65	5	3

Student Orientation

1. Does this institution conduct a program of orientation for newly enrolled students? Fill in one oval.

	No	Yes
1a	0	0

If you filled in "no" to item 1 above, skip the following item and go on to page 12, Job Placement Services and Follow-Through.

2. Does this student orientation include the following? Fill in one oval for each option.

	No	Yes	
2a	0	0	An orientation newsletter or student handbook.
2b	0	0	Oral presentations or written documents prepared by students who have been enrolled for one year or more.
2c	0	0	Instructions on how and where to voice complaints and grievances.
2d	0	0	Information on how to apply for student financial aid.

Job Placement Services and Follow-Through

	Occupational Training Institutions								Degree Granting Institutions								All Institutions											
	N				%				N				%				N				%							
	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9				
1.																												Does this institution state that it offers job placement services or other assistance to students in finding jobs? Fill in one oval.
																									No	Yes		
1a	13	12	.	.	52	48	.	.	2	10	.	.	17	83	.	.	15	22	.	.	41	60	.	.	○	○		
																												If you filled in "no" to item 1 above, skip item 2 and go on to item 3.
2.																												Does the placement assistance offered by this institution include the following aspects? Fill in one oval for each option.
																									No	Yes		
2a	12	1	12	.	48	4	48	.	7	3	2	.	58	25	17	.	19	4	14	.	51	11	38	.	○	○		A fee for the service.
2b	6	7	12	.	24	28	48	.	1	9	2	.	8	75	17	.	7	16	14	.	19	43	38	.	○	○		Formal training in job-seeking and job-holding skills.
2c	2	11	12	.	8	44	48	.	1	9	2	.	8	75	17	.	3	20	14	.	8	54	38	.	○	○		Contacting prospective employers.
2d	2	11	12	.	8	44	48	.	.	10	2	2	.	83	17	.	2	21	14	.	5	57	38	.	○	○		Making job interview appointments for individual students.
2e	13	.	12	.	52	.	48	.	10	.	2	.	83	.	17	.	23	.	14	.	62	.	38	.	○	○		Referral to a commercial placement service which charges a fee.
2f	13	.	12	.	52	.	48	.	7	3	2	.	58	25	17	.	20	3	14	.	54	8	38	.	○	○		Collation and distribution of "Help Wanted" ads from a newspaper.
2g	5	8	12	.	20	32	48	.	.	.	10	.	.	83	17	.	5	18	14	.	14	49	38	.	○	○		Assistance in finding part-time jobs.
2h	.	.	11	14	.	.	44	56	.	2	2	8	.	17	17	67	.	2	13	22	.	5	35	60		○		Other, please describe in the space provided at the end of the form.
3.																												Does this institution regularly collect data on the employment success (however defined) of the following persons? Fill in one oval for each option.
																									No	Yes	This institution currently has no students or graduates of this type.	
3a	23	.	2	.	92	.	8	.	11	1	.	.	92	8	.	.	34	1	2	.	92	3	5	.	○	○	○	Former students who did not graduate.
3b	13	12	.	.	52	.	48	.	4	8	.	.	33	67	.	.	17	20	.	.	46	54	.	.	○	○	○	Recent graduates (within one year of graduation).
3c	18	6	1	.	72	24	4	.	9	3	.	.	75	25	.	.	27	9	1	.	73	24	3	.	○	○	○	Recent graduates (within five years of graduation).
4.																												Does this institution regularly collect data on the numbers and characteristics of students who drop out of the school? Fill in one oval for each option.
																									No	Yes		
4a	20	5	.	.	80	20	.	.	2	7	.	3	17	58	.	25	22	12	.	3	60	32	.	8	○	○		For all students enrolled in occupational or professional preparation programs or majors.
4b	19	3	.	3	76	12	.	12	2	6	.	4	17	50	.	33	21	9	.	7	57	24	.	19	○	○		For all enrolled students regardless of program or major.

Occupational Training Institutions								Degree Granting Institutions								All Institutions							
N				%				N				%				N				%			
0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9
2	21	1	1	8	84	4	4	.	12	.	.	.	100	.	.	2	33	1	1	5	89	3	3
.	25	.	.	.	100	.	.	.	12	.	.	.	100	.	.	.	37	.	.	.	100	.	.
4	19	.	2	16	76	.	8	.	10	.	2	.	83	.	17	4	29	.	4	11	78	.	11
1	23	.	1	4	92	.	4	.	12	.	.	.	100	.	.	1	35	.	1	3	95	.	3
9	12	.	4	36	48	.	16	1	10	.	1	8	83	.	8	10	22	.	5	27	60	.	14
.	1	.	24	.	4	.	96	.	2	.	10	.	17	.	83	.	3	.	34	.	8	.	92
14	1	.	.	56	44	.	.	5	7	.	.	42	58	.	.	19	18	.	.	51	49	.	.

Recordkeeping Practices

1. Are individual student records maintained which contain the following items? Fill in one oval for each option.

	No	Yes	
1a	○	○	Total fees paid by the student.
1b	○	○	Courses taken and completed by the student.
1c	○	○	Internships or other forms of supervised professional practice.
1d	○	○	Academic credits, grades, earned by the student.
1e	○	○	Financial aid amounts, including loans, if any, received by the student.
1f		○	Other, please describe in the space provided at the end of the form.

2. Does this institution have a written policy for maintaining individual student access to records for a period of at least two years in the event of a school closure or change of control? Fill in one oval.

	No	Yes
2a	○	○

Occupational Training Institutions	Degree Granting Institutions	All Institutions
19 - 0's 3 - 1's 3 omits	8 - 0's 2 - 3's 2 omits	27 - 0's 3 - 1's 2 - 3's 5 omits
20 - 0's 1 - 7's 2 - 50's 2 omits	9 - 0's 1 - 4 1 - 12 1 - 25	29 - 0's 1 - 4 1 - 7 1 - 12 1 - 25 2 - 50's 2 omits

N				%				N				%				N				%			
0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9
24	.	.	1	96	.	.	4	11	1	.	.	92	8	.	.	35	1	.	1	95	3	.	3

Stability of Instructional Staff

1. During the previous calendar year, in how many courses (i.e., sections) offered by your institution was the instructor replaced after instruction had begun? Fill in the number. Treat sections from a multi-section course as separate courses. Enter none as zero.

1a _______sections

2. This represented what percentage of the total number of courses (i.e., sections) offered during this calendar year? Fill in the percentage. Enter none as zero.

2a _______percentage

3. In any courses (i.e., sections) offered during the previous calendar year, was the instructor replaced twice or more often after instruction had begun? Fill in one oval.

	No	Yes
3a	0	0

	Occupational Training Institutions								Degree Granting Institutions								All Institutions							
	N				%				N				%				N				%			
	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9
1a	25	.	.	.	100	.	.	.	12	.	.	.	100	.	.	.	37	.	.	.	100	.	.	.
1b	25	.	.	.	100	.	.	.	12	.	.	.	100	.	.	.	37	.	.	.	100	.	.	.
1c	25	.	.	.	100	.	.	.	12	.	.	.	100	.	.	.	37	.	.	.	100	.	.	.
2a	1	.	24	.	4	.	.	96	.	.	12	.	.	.	100	.	1	.	36	.	3	.	97	.
2b	1	.	24	.	4	.	.	96	.	.	12	.	.	.	100	.	1	.	36	.	3	.	97	.
3a	12	11	.	2	48	44	.	8	2	10	.	.	17	83	.	.	14	21	.	2	38	57	.	5

Representation of Chartered, Approved, or Accredited Status

1. Is your institution currently on suspension, probation, or some other form of limitation or sanction for noncompliance with designated standards, by any of the following government agencies? Fill in one oval for each option.

	No	Yes	
1a	0	0	A local government agency (e.g., Consumer Protection Agency, District Attorney, etc.).
1b	0	0	A state government agency (e.g., State Chartering or Licensing Agency, Attorney General, etc.).
1c	0	0	A federal government agency (e.g., Federal Trade Commission, Office of Guaranteed Student Loans/DHEW, etc.).

If you filled in "no" to all of the above options, skip item 2 and go on to item 3.

2. Are the facts of the above limitation(s) or sanction(s) publicly disclosed to enrolled students and prospective students? Fill in one oval for each option.

	No	Yes	
2a	0	0	In printed form to all enrolled students.
2b	0	0	In printed form to all prospective students.

3. Do the public representations of this institution clearly distinguish between (e.g., list separately) institutional accreditation, specialized or professional program accreditation, state VA-approving agency course approval, and state licensing and chartering? Fill in one oval.

	No	Yes
3a	0	0

Occupational Training Institutions								Degree Granting Institutions								All Institutions							
N				%				N				%				N				%			
0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9
20	3	2	.	80	12	8	.	9	3	.	.	75	25	.	.	29	6	.	2	78	16	.	5
7	17	.	1	28	68	.	4	2	10	.	.	17	83	.	.	9	27	.	1	24	73	.	3
12	11	.	2	48	44	.	8	5	6	.	1	42	50	.	8	17	17	.	3	46	46	.	8
12	11	.	2	48	44	.	8	7	5	.	.	58	42	.	.	19	16	.	2	51	43	.	5
21	4	.	.	84	16	.	.	9	3	.	.	75	25	.	.	30	7	.	.	81	19	.	.
9	11	4	1	36	44	16	4	.	9	3	.	.	75	25	.	9	20	7	1	24	54	19	3
17	2	4	2	68	8	16	8	6	2	3	1	50	17	25	8	23	4	7	3	62	11	19	8
21	.	4	.	84	.	16	.	9	.	3	.	75	.	25	.	30	.	7	.	81	.	19	.
.	.	25	.	.	.	100	.	.	.	12	.	.	.	100	.	.	.	37	.	.	.	100	.
.	.	25	.	.	.	100	.	.	.	12	.	.	.	100	.	.	.	37	.	.	.	100	.

Financial Stability

1. Are the central financial records and reports of this institution subjected to the following audits or inspections? Fill in one oval for each option.

	No	Yes	
1a	○	○	Annual uncertified audit by an accounting firm.
1b	○	○	Annual certified audit by an accounting firm.
1c	○	○	Inspection by a state regulatory or auditing agency.
1d	○	○	Inspection by a federal regulatory or auditing agency.

2. Is this a publicly-supported institution? Fill in one oval.

	No	Yes
2a	○	○

If you filled in "yes" to item 2 above, skip the following four items and go on to page 17, Instructional Programs.

3. Does this institution have an endowment or retained earnings fund to pay operating expenses not covered by student tuition receipts? Fill in one oval.

	No	Yes
3a	○	○

4. Do the financial reporting practices of this institution report unearned tuition as assets? Fill in one oval.

	No	Yes
4a	○	○

5. Is this institution currently engaged in bankruptcy proceedings or is there any serious possibility that it might enter into bankruptcy proceedings during the next 12 months? Fill in one oval.

	No	Yes
5a	○	○

If you filled in "no" to item 5 above, skip the following item and go on to page 17, Instructional Programs.

6. Does this institution publicly disclose information about bankruptcy proceedings that are underway or planned? Fill in one oval for each option.

	No	Yes	
6a	○	○	To all enrolled students.
6b	○	○	To all prospective enrollees.

Occupational Training Institutions								Degree Granting Institutions								All Institutions							
N				%				N				%				N				%			
0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9
15	9	.	1	60	36	.	4	2	8	.	2	17	67	.	17	17	17	.	3	46	46	.	8
14	10	.	1	56	40	.	4	4	6	.	2	33	50	.	17	18	16	.	3	49	43	.	8
2	9	13	1	8	36	52	4	2	6	2	2	17	50	17	17	4	15	15	3	11	41	41	8
1	10	13	1	4	40	52	4	5	3	2	2	42	25	17	17	6	13	15	3	16	35	41	8
.	13	11	1	.	52	44	5	.	5	5	2	.	42	42	17	.	18	16	3	.	49	43	8
.	18	6	1	.	72	24	4	.	8	2	2	.	67	17	17	.	26	8	3	.	70	22	8

Instructional Programs

1. Does this institution maintain advisory committee(s) on curriculum content? Fill in one oval for each option.

	No	Yes	
1a	0	0	For some of the occupational/vocational training program areas offered at this institution.
1b	0	0	For all occupational/vocational training program areas offered at this institution.

If you filled in "no" for both options to item 1 above, skip item 2 and go on to item 3.

2. Do these committee(s) include representatives of potential employers? Fill in one oval for each option.

	No	Yes	
2a	0	0	For some of the occupational/vocational training program areas offered at this institution.
2b	0	0	For all occupational/vocational training program areas offered at this institution.

3. Do all of the occupational training programs in this institution possess specialized/professional accreditation, if this is a requirement for the employment of graduates in those occupations? Fill in one oval.

	No	Yes	
3a	0	0	0 —Specialized/professional accreditation is not required for employment in any occupation for which this institution provides training.

4. Do all of the occupational training programs in this institution provide sufficient training on the use of basic tools and equipment, if this is a requirement for the employment of graduates in those occupations? Fill in one oval.

	No	Yes	
4a	0	0	0 —Training on the use of basic tools and equipment is not required for employment in any occupation for which this institution provides training.

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	Occupational Training Institutions								Degree Granting Institutions								All Institutions							
	N				%				N				%				N				%			
	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9
5a	1	14	9	1	4	56	36	4	.	6	4	2	.	50	33	17	1	20	13	3	3	54	35	8
6a	1	15	8	1	4	60	32	4	.	6	4	2	.	50	33	17	1	21	12	3	3	57	32	8
7a	.	17	7	1	.	68	28	4	.	6	4	2	.	50	33	17	.	23	11	3	.	62	30	8
8a	2	22	.	1	8	88	.	4	1	9	.	2	8	75	.	17	3	31	.	3	8	84	.	8

5. Do all of the occupational training programs in this institution provide for internships and/or supervised practice on the job, if this is a requirement for the employment of graduates in those occupations? Fill in one oval.

	No	Yes	
5a	○	○	○ Internships and/or supervised practice on the job are not required for employment in any occupation for which this institution provides training.

6. Do all of the occupational training programs in this institution provide for internships and/or supervised practice in simulated job situations, if this is a requirement for the employment of graduates in those occupations? Fill in one oval.

	No	Yes	
6a	○	○	○ Internships and/or supervised practice in simulated job situations are not required for employment in any occupation for which this institution provides training.

7. Do all of the occupational training programs in this institution provide for instruction on topics necessary for state or professional certification in this state, if such certification is a requirement for the employment of graduates in those occupations? Fill in one oval.

	No	Yes	
7a	○	○	○ State or professional certification in this state is not required for employment in any occupation for which this institution provides training.

8. Does this institution require reviews of the relevance and timeliness of its occupational/vocational training curricula once every two years or more frequently? Fill in one oval.

	No	Yes
8a	○	○

Occupational Training Institutions								Degree Granting Institutions								All Institutions							
N				%				N				%				N				%			
0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9	0	1	8	9
13	11	.	1	52	44	.	4	3	7	.	2	25	58	.	17	16	18	.	3	43	49	.	8
3	8	13	1	12	32	52	4	1	6	3	2	8	50	25	17	4	14	16	3	11	38	43	8
2	9	13	1	8	36	52	4	3	4	3	2	25	33	25	17	5	13	16	3	14	35	43	8
3	21	.	1	12	84	.	4	.	10	.	2	.	83	.	17	3	31	.	3	8	84	.	8
6	18	.	1	24	72	.	4	.	10	.	2	.	83	.	17	6	28	.	3	16	76	.	8

Instructional Equipment and Facilities

1. Does this institution maintain advisory committees on instructional equipment and facilities? Fill in one oval.

	No	Yes
1a	0	0

If you filled in "no" to item 1 above, skip item 2 and go on to item 3.

2. Do these advisory committees include representatives of potential employers? Fill in one oval for each option.

	No	Yes	
2a	0	0	For some of the occupational/vocational training program areas offered at this institution.
2b	0	0	For all occupational/vocational training program areas offered at this institution.

3. Does this institution annually budget and expend sufficient funds for replacing worn or outdated instructional equipment? Fill in one oval.

	No	Yes
3a	0	0

4. Does this institution annually budget and expend funds for new instructional equipment sufficient to meet projected program needs? Fill in one oval.

	No	Yes
4a	0	0

APPENDIX H

ENROLLED STUDENT QUESTIONNAIRE AND SUMMARY OF EDITED AND SAMPLE-WEIGHTED FIELD TEST RESPONSES

Occupational Training Institutions: N = 18

Occupational Training Students: N = 1813

Degree Granting Institutions: N = 8

Degree Granting Students: N = 5561

All Institutions: N = 26

All Students: N = 7375

Item response codes used in summary of field test results:

0 = response was not marked

1 = response was marked

8 = item intentionally skipped according to branching instructions

9 = item omitted

STUDENT INFORMATION

1. Are you still enrolled in the institution named on the cover? Fill in one.
0 Yes
0 No

Occupational Training Institutions %			Degree Granting Institutions %			All Institutions %		
Yes	No	Omitted	Yes	No	Omitted	Yes	No	Omitted
49	49	3	60	38	2	57	41	2

2. How many total months have you attended this particular institution as either a part-time or a full-time student? ____ months

Occupational Training Institutions	Degree Granting Institutions	All Institutions
Average	Average	Average
7.98	8.84	8.64

3. How many schools have you attended after leaving high school, other than this one? ____ schools

Occupational Training Institutions	Degree Granting Institutions	All Institutions
1.06	0.73	0.81

4. What is your current enrollment status? Fill in one if you are still enrolled.
4a 0 Part-time student.
4b 0 Full-time student.

Occupational Training Institutions %			Degree Granting Institutions %			All Institutions %		
PT	FT	Omitted	PT	FT	Omitted	PT	FT	Omitted
9	39	52	8	52	40	8	49	43

5. Are you classified as a resident or a non-resident student for tuition purposes? Fill in one if you are still enrolled.
5a 0 Resident.
5b 0 Non-resident
5c 0 I don't know.

Occupational Training Institutions %				Degree Granting Institutions %				All Institutions %			
R	NR	?	Omitted	R	NR	?	Omitted	R	NR	?	Omitted
29	6	8	58	44	11	4	41	40	10	5	45

6. What is your sex?
6a 0 Male
6b 0 Female

Occupational Training Institutions %			Degree Granting Institutions %			All Institutions %		
M	F	Omitted	M	F	Omitted	M	F	Omitted
45	53	2	51	48	1	49	49	2

REFUND POLICIES AND PRACTICES

Occupational Training Institutions %				Degree-Granting Institutions %				All Institutions %					
0	1	8	9	0	1	8	9	0	1	8	9		
												1.	Did your school require you to pay, or sign a legal agreement to pay, any of the following fees or charges before you started classes? Fill in all that apply.
70	29	.	2	35	64	.	1	44	55	.	1	*1a*	0 Tuition.
97	1	.	2	79	20	.	1	83	15	.	1	*1b*	0 Room and board charges.
91	8	.	2	82	17	.	1	84	14	.	1	*1c*	0 Application or registration fees that exceeded $50.
34	64	.	2	73	26	.	1	63	35	.	1	*1d*	0 None of the above to my knowledge.
95	3	.	2	94	5	.	1	95	4	.	1	*1e*	0 I don't know if any fees were required in advance.
													If you filled in "Tuition," "Room and board charges," or "Application or registration fees that exceeded $50." go on to the following items. Otherwise, skip to page 3, Recruiting and Admissions Practices.
												2.	Did your school inform you about its policies for refunding fees and charges to students if they withdraw from the school before they complete an enrollment period? Fill in one only.
9	22	67	2	21	48	30	2	18	41	39	2	*2a*	0 Yes.
24	7	67	2	53	16	30	2	46	14	39	2	*2b*	0 No.
29	2	67	2	63	5	30	2	55	4	39	2	*2c*	0 I don't know.
													If you filled in "Yes," go on to the following items. Otherwise, skip to page 3, Recruiting Admissions Practices.
												3.	Do your school's refund policies describe the following items? Fill in all that apply.
4	17	76	3	10	37	51	2	8	32	57	2	*3a*	0 The fees and charges which are refundable and those which are not.
6	15	76	3	11	36	51	2	10	31	57	2	*3b*	0 The conditions which students must meet to get refunds.
16	5	76	3	34	13	51	2	30	11	57	2	*3c*	0 The length of time it takes to get a refund after formal application.
21	1	76	3	46	1	51	2	40	1	57	2	*3d*	0 None of the above to my knowledge.
20	1	76	3	42	5	51	2	37	4	57	2	*3e*	0 I don't know what items the refund policy describes.
												4.	Do your school's refund policies describe the time it takes to get a refund after a student formally applies for one? Fill in one only.
19	3	76	3	45	1	51	3	39	2	57	3	*4a*	0 10 days or less.
22	.	76	3	46	1	51	3	40	1	57	3	*4b*	0 11-15 days.
22	.	76	3	45	1	51	3	40	1	57	3	*4c*	0 16-25 days.
22	.	76	3	45	1	51	3	39	1	57	3	*4d*	0 26 days - one month.
21	1	76	3	46	1	51	3	39	1	57	3	*4e*	0 More than one month.
5	17	76	3	5	41	51	3	5	35	57	3	*4f*	0 I don't know.

RECRUITING AND ADMISSIONS PRACTICES

Occupational Training Institutions				Degree-Granting Institutions				All Institutions					
%				%				%					
0	1	8	9	0	1	8	9	0	1	8	9		
												1.	Did your school inform you about any of the following recruiting and admissions policies? Fill in all that apply.
86	10	.	4	83	14	.	3	84	13	.	3	*1a* 0	A code of ethical recruiting practices observed by the school.
67	29	.	4	66	31	.	3	66	30	.	3	*1b* 0	A requirement that students interested in attending the school talk to a school representative on campus before they enroll.
72	23	.	4	76	21	.	3	75	21	.	3	*1c* 0	A requirement that students who decide to attend the school sign an enrollment agreement describing costs, tuition or fee payment requirements, and educational services to be provided.
93	3	.	4	90	8	.	3	90	7	.	3	*1d* 0	A requirement that students who are enrolled by a recruiting agent while they are off campus get a chance to reaffirm their decision (or change their minds) within a certain time.
49	46	.	4	46	52	.	3	47	50	.	3	*1e* 0	None of the above to my knowledge.
												2.	Does your school provide the following for beginning students? Fill in all that apply.
54	42	.	4	47	52	.	1	49	50	.	2	*2a* 0	An opportunity to take a placement test to determine the level of course work that is appropriate for each student.
54	42	.	4	45	54	.	1	47	51	.	2	*2b* 0	A course in basic English grammar and composition for students who are not adequately prepared in this area.
41	55	.	4	51	48	.	1	49	50	.	2	*2c* 0	A course in basic mathematics for students who are not adequately prepared in this area.
72	24	.	4	39	60	.	1	47	51	.	2	*2d* 0	An opportunity to take advanced courses for students who show that they are prepared for them.
77	19	.	4	91	8	.	1	88	11	.	2	*2e* 0	None of the above to my knowledge.
86	10	.	4	89	11	.	1	88	10	.	2	*2f* 0	I don't know what options are available for beginning students.

INSTRUCTIONAL STAFF

1. Have you ever filled out written evaluation forms on your instructors? Fill in all that apply.

Occupational Training Institutions %				Degree-Granting Institutions %				All Institutions %					
0	1	8	9	0	1	8	9	0	1	8	9		
76	22	.	2	39	61	.	1	48	52	.	1	*1a* 0	Yes, the evaluations were conducted by school staff.
93	4	.	2	74	26	.	1	79	20	.	1	*1b* 0	Yes, the evaluations were conducted by students or student organizations.
33	64	.	2	84	15	.	1	72	27	.	1	*1c* 0	No.
90	7	.	2	96	3	.	1	95	4	.	1	*1d* 0	I don't know.

If you filled in either "Yes" answer, go on to the following items. Otherwise, skip to page 5, Disclosure in Written Documents.

2. Are such evaluation forms usually filled out on a regular basis (for example, every semester, at the end of every course, etc.)? Fill in all that apply.

Occupational Training Institutions %				Degree-Granting Institutions %				All Institutions %					
0	1	8	9	0	1	8	9	0	1	8	9		
11	14	72	3	33	48	18	1	28	39	32	1	*2a* 0	Yes, the school conducts evaluations regularly.
23	2	72	3	60	21	18	1	51	16	32	1	*2b* 0	Yes, students or student organizations conduct evaluations regularly.
18	7	72	3	70	11	18	1	57	10	32	1	*2c* 0	No.
22	3	72	3	77	4	18	1	63	4	32	1	*2d* 0	I don't know.

3. Do students get to see the results of their evaluations of the faculty? Fill in all that apply.

Occupational Training Institutions %				Degree-Granting Institutions %				All Institutions %					
0	1	8	9	0	1	8	9	0	1	8	9		
21	4	72	4	74	7	18	1	61	6	32	2	*3a* 0	Yes, they are made available by the school.
24	1	72	4	68	13	18	1	57	10	32	2	*3b* 0	Yes, they are made available by students or student organizations.
8	16	72	4	31	50	18	1	25	42	32	2	*3c* 0	No.
20	5	72	4	69	12	18	1	56	10	32	2	*3d* 0	I don't know.

DISCLOSURE IN WRITTEN DOCUMENTS

Occupational Training Institutions %				Degree-Granting Institutions %				All Institutions %						
0	1	8	9	0	1	8	9	0	1	8	9			
												1.		Which option best describes how your school gives out its general catalog or bulletin (or other booklet that serves as a catalog)? Fill in one only.
26	70	.	4	12	88	.	1	15	84	.	2	*1a*	○	Anyone who is interested receives a free copy on request.
95	1	.	4	99	1	.	1	98	1	.	2	*1b*	○	Anyone who is interested receives a copy for $2 or less.
96	.	.	4	99	.	.	1	99	.	.	2	*1c*	○	Anyone who is interested receives a copy for an amount exceeding $2.
95	1	.	4	98	1	.	1	97	1	.	2	*1d*	○	Enrolled students receive a free copy, but other persons interested in having a copy are charged a small amount.
95	1	.	4	98	1	.	1	98	1	.	2	*1e*	○	Copies are neither given out nor sold, but I am aware of a central place on campus where I can go to read one.
93	4	.	4	99	1	.	1	98	1	.	2	*1f*	○	My school does not publish a catalog or general information bulletin.
77	19	.	4	91	9	.	1	87	11	.	2	*1g*	○	I don't know about the policy for giving out catalogs.
												2.		Have you applied for and taken out a loan at your school? Fill in one only.
86	9	.	5	73	27	.	1	76	23	.	2	*2a*	○	Yes.
11	85	.	5	27	72	.	1	23	75	.	2	*2b*	○	No.
94	1	.	5	99	1	.	1	98	.	.	2	*2c*	○	I don't know.
														If you filled in "Yes," go on to the following item. Otherwise, skip to page 6, Student Orientation.
												3.		When you applied for a loan did your school give you a pamphlet (or other papers) which told you about the following? Fill in all that apply.
2	8	86	5	5	22	73	1	4	19	76	2	*3a*	○	Your obligations about repaying the loan.
3	6	86	5	8	19	73	1	7	16	76	2	*3b*	○	How you go about repaying the loan.
2	7	86	5	7	20	73	1	6	17	76	2	*3c*	○	How much interest you will be paying on the loan each year.
1	8	86	5	8	19	73	1	6	16	76	2	*3d*	○	How much time you will have to pay off the loan.
6	3	86	5	17	10	73	1	15	8	76	2	*3e*	○	How you go about getting more time to pay off the loan if you need it.
6	3	86	5	18	9	73	1	15	8	76	2	*3f*	○	How you go about deferring or canceling parts of the loan, if such action applies to you.
9	1	86	5	25	2	73	1	21	2	76	2	*3g*	○	None of the above to my knowledge.
9	.	86	5	25	2	73	1	21	1	76	2	*3h*	○	I don't know whether I was told about these things.

STUDENT ORIENTATION

1. Did your school give you an orientation to the school when you first enrolled? Fill in one only.

Occupational Training Institutions %				Degree-Granting Institutions %				All Institutions %					
0	1	8	9	0	1	8	9	0	1	8	9		
46	52	.	2	21	79	.	1	27	72	.	1	1a	0 Yes.
57	41	.	2	84	16	.	1	77	22	.	1	1b	0 No.
93	5	.	2	94	5	.	1	94	5	.	1	1c	0 I don't know.

If you filled in "Yes," go on to the following items. Otherwise, skip to page 7, Instructional Equipment and Facilities.

2. Did the orientation include the following? Fill in all that apply.

Occupational Training Institutions %				Degree-Granting Institutions %				All Institutions %					
0	1	8	9	0	1	8	9	0	1	8	9		
17	35	46	2	9	7[illegible]	21	1	11	61	27	1	2a	0 A written orientation guide or student handbook.
44	7	46	2	31	48	21	1	34	38	27	1	2b	0 Reading statements by, or listening to, students who had been enrolled for one year or more.
37	14	46	2	49	30	21	1	46	26	27	1	2c	0 How to go about filing a complaint or a grievance.
23	29	46	2	20	58	21	1	21	51	27	1	2d	0 Information on student financial aid that is available.
45	7	46	2	78	1	21	1	70	2	27	1	2e	0 None of the above to my knowledge.
49	2	46	2	73	6	21	1	67	5	27	1	2f	0 I don't know what was included in the orientation.

If you filled in "A written orientation guide or student handbook," go on to the following item. Otherwise, skip to page 7, Instructional Equipment and Facilities.

3. Did the written orientation guide or student handbook contain the following? Fill in all that apply.

Occupational Training Institutions %				Degree-Granting Institutions %				All Institutions %					
0	1	8	9	0	1	8	9	0	1	8	9		
3	32	63	2	17	53	29	1	13	48	37	2	3a	0 School policies or regulations about class attendance.
25	10	63	2	25	45	29	1	25	37	37	2	3b	0 School policies or practices about transfer of credit to or from other postsecondary institutions.
8	27	63	2	13	57	29	1	12	49	37	2	3c	0 Grading system and minimum grades required to earn course credits.
26	9	63	2	31	39	29	1	30	32	37	2	3d	0 Requirements for transfer to other programs within the school.
6	29	63	2	14	56	29	1	12	49	37	2	3e	0 Requirements for graduation.
33	2	63	2	69	1	29	1	60	1	37	2	3f	0 None of the above to my knowledge.
34	1	63	2	65	5	29	1	57	4	37	2	3g	0 I don't know what is in the guide.

INSTRUCTIONAL EQUIPMENT AND FACILITIES

Occupational Training Institutions %				Degree-Granting Institutions %				All Institutions %					
0	1	8	9	0	1	8	9	0	1	8	9		
												1.	In the courses you are taking, or have completed, at this school, do you feel that overcrowding has prevented you from adequate use of equipment/facilities or necessary contact with instructors? Fill in one only.
88	10	.	2	90	10	.	1	89	10	.	1	*1a* 0	Yes, in many courses.
86	12	.	2	71	28	.	1	75	24	.	1	*1b* 0	Yes, in a few courses.
25	73	.	2	39	60	.	1	35	63	.	1	*1c* 0	No.
95	3	.	2	98	1	.	1	98	1	.	1	*1d* 0	I don't know.
												2.	In the courses you are taking, or have completed, at this school, do you feel you have been required to use worn or outdated equipment/facilities? Fill in one only.
87	11	.	2	94	5	.	1	93	6	.	1	*2a* 0	Yes, in many courses.
82	16	.	2	83	17	.	1	83	16	.	1	*2b* 0	Yes, in a few courses.
32	66	.	2	24	75	.	1	26	73	.	1	*2c* 0	No.
93	5	.	2	97	2	.	1	96	3	.	1	*2d* 0	I don't know.
												3.	Are you taking, or have you completed, any new courses at this school (in other words, courses being offered by the school for the first time)? Fill in one only.
80	16	.	4	75	24	.	1	76	22	.	2	*3a* 0	Yes.
22	74	.	4	34	65	.	1	31	67	.	2	*3b* 0	No.
90	6	.	4	90	10	.	1	90	9	.	2	*3c* 0	I don't know.
													If you filled in "Yes," go on to the following item. Otherwise, skip to page 8, Job Placement Services and Follow-Through.
												4.	In the courses offered for the first time which you have taken (or are now taking) at this school, do you feel your school bought enough of the right kind of instructional equipment? Fill in one only.
3	13	80	4	6	19	75	1	5	17	76	2	*4a* 0	Yes.
14	2	80	4	21	4	75	1	19	3	76	2	*4b* 0	No.
15	1	80	4	23	2	75	1	21	2	76	2	*4c* 0	I don't know.

JOB PLACEMENT SERVICES AND FOLLOW-THROUGH

1. Does your school say in any of its advertising or catalog materials that it offers help to its students in getting placed on a jot? Fill in one only.

Occupational Training Institutions %				Degree-Granting Institutions %				All Institutions %						
0	1	8	9	0	1	8	9	0	1	8	9			
95	3	.	2	98	1	.	1	97	2	.	1	*1a*	○	**Yes, for a fee.**
58	39	.	2	41	58	.	1	46	53	.	1	*1b*	○	**Yes, at no additional cost to students.**
67	30	.	2	85	14	.	1	81	18	.	1	*1c*	○	**No.**
73	24	.	2	73	27	.	1	73	26	.	1	*1d*	○	**I don't know.**

If you filled in either "Yes" answer, go on to the following item. Otherwise, skip to page 9, Advertising Practices.

2. Who is eligible for the school's placement assistance? Fill in all that apply.

Occupational Training Institutions %				Degree-Granting Institutions %				All Institutions %						
0	1	8	9	0	1	8	9	0	1	8	9			
25	16	56	3	34	23	41	2	32	22	44	2	*2a*	○	Currently enrolled part-time students.
22	19	56	3	32	26	41	2	29	24	44	2	*2b*	○	Currently enrolled full-time students.
38	4	56	3	53	5	41	2	49	4	44	2	*2c*	○	Former students who did not graduate.
20	22	56	3	40	18	41	2	35	19	44	2	*2d*	○	Recent graduates (within some stated time limit).
22	19	56	3	35	23	41	2	32	22	44	2	*2e*	○	Any graduates.
41	.	56	3	58	.	41	2	54	.	44	2	*2f*	○	No help is offered to anyone.
41	1	56	2	57	1	41	1	53	1	44	2	*2g*	○	None of the above to my knowledge.
33	9	56	2	40	19	41	1	38	16	44	2	*2h*	○	I don't know who is eligible.

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ADVERTISING PRACTICES

Occupational Training Institutions %				Degree-Granting Institutions %				All Institutions %					
0	1	8	9	0	1	8	9	0	1	8	9		
												1.	Do you have knowledge of your school using any of the following advertising techniques? Fill in all that apply.
88	8	.	4	95	4	.	2	93	5	.	2	*1a* ○	Advertising in the "Help Wanted" section of the newspapers, not for job openings at the school, but to get "leads" on people interested in the school's field of instruction.
93	3	.	4	94	5	.	2	94	4	.	2	*1b* ○	Setting up and publicizing so-called contests for the most "outstanding" potential students, such as "Talent" searches.
94	3	.	4	95	3	.	2	95	3	.	2	*1c* ○	Statements by people endorsing the school who did not, in fact, attend the school.
94	2	.	4	97	2	.	2	96	2	.	2	*1d* ○	Offers of "discounts" (for a limited time only) on tuition charges, room and board charges, etc.
13	84	.	4	10	89	.	2	10	88	.	2	*1e* ○	None of the above to my knowledge.
												2.	In the advertising which your school has distributed to the public and which you have either read or heard, have any of the following claims been included? Fill in all that apply.
91	4	.	5	97	2	.	1	95	3	.	2	*2a* ○	If you complete the education or training offered at your school, you are guaranteed a job.
61	35	.	5	72	27	.	1	69	29	.	2	*2b* ○	If you complete the education or training offered at your school, you probably will get a job.
85	11	.	5	93	6	.	1	91	7	.	2	*2c* ○	This school has special connections with business, industry, or government employers, and you will receive special consideration if, after you graduate, you apply to them for a job.
95	.	.	5	95	4	.	1	95	3	.	2	*2d* ○	Your school offers scholarships to students which in fact, are not awarded.
93	2	.	5	96	3	.	1	95	3	.	2	*2e* ○	Your school's teaching faculty has well-known experts on it when, in fact, these individuals teach no classes.
57	39	.	5	49	50	.	1	51	47	.	2	*2f* ○	None of the above to my knowledge.
75	20	.	5	83	16	.	1	81	17	.	2	*2g* ○	I don't know about my school's advertising.

STABILITY OF INSTRUCTIONAL STAFF

1. In how many courses you have taken at this school was an instructor replaced (for the rest of the course) after instruction had begun? Fill in only the oval next to the right number.

		Occupational Training Institutions %				Degree-Granting Institutions %				All Institutions %			
		0	1	8	9	0	1	8	9	0	1	8	9
1a	○ No courses.	24	74	.	2	17	82	.	1	19	80	.	1
1b	○ One course.	86	12	.	2	87	13	.	1	87	12	.	1
1c	○ Two courses.	93	6	.	2	96	3	.	1	95	4	.	1
1d	○ Three courses.	96	2	.	2	99	.	.	1	98	1	.	1
1e	○ Four courses.	98	.	.	2	99	.	.	1	99	.	.	1
1f	○ Five courses.	98	.	.	2	99	.	.	1	99	.	.	1
1g	○ Six or more courses.	97	1	.	2	99	.	.	1	99	.	.	1
1h	○ I don't know.	95	3	.	2	98	2	.	1	97	2	.	1

2. In any courses you took during the previous twelve months at this school was the instructor replaced twice or more often after instruction had begun? Fill in one only.

		Occupational Training Institutions %				Degree-Granting Institutions %				All Institutions %			
		0	1	8	9	0	1	8	9	0	1	8	9
2a	○ Yes.	92	4	.	3	95	3	.	2	95	3	.	2
2b	○ No.	10	87	.	3	5	93	.	2	6	92	.	2
2c	○ I don't know.	91	6	.	3	96	2	.	2	95	3	.	2

REPRESENTATION OF CHARTERED, APPROVED, OR ACCREDITED STATUS

Occupational Training Institutions %				Degree-Granting Institutions %				All Institutions %					
0	1	8	9	0	1	8	9	0	1	8	9		
												1.	Is your school currently under suspension, probation, or some other form of penalty by a local, state, or federal school regulatory agency (for example, the District Attorney, State Bureau of School Approvals, Federal Trade Commission, etc.)? Fill in one only.
97	1	.	2	97	3	.	1	97	2	.	1	*1a* ○	Yes.
52	46	.	2	32	68	.	1	37	62	.	1	*1b* ○	No.
46	51	.	2	70	30	.	1	64	35	.	1	*1c* ○	I don't know.
													If you answered "Yes," go on to the following item. Otherwise, skip to item 3 below.
												2.	How did you learn about the above sanction(s)? Fill in all that apply.
1	.	97	2	3	.	96	1	2	.	97	1	*2a* ○	A written statement given out to all persons applying for admission.
1	.	97	2	2	.	96	1	2	.	97	1	*2b* ○	A written statement given out to all enrolled students.
.	.	97	2	3	.	96	1	2	.	97	1	*2c* ○	Read about it in a school newspaper or some other school-wide publication.
1	.	97	2	1	2	96	1	1	1	97	1	*2d* ○	From a source outside the school.
1	.	97	2	3	.	96	1	2	.	97	1	*2e* ○	None of the above.
1	.	97	2	2	.	96	1	2	.	97	1	*2f* ○	I don't know.
												3.	Is your school currently under suspension, probation, or some other form of sanction by a state, federal, or private school accreditation agency? Fill in one only.
95	1	.	5	92	4	.	4	93	3	.	4	*3a* ○	Yes.
56	40	.	5	37	60	.	4	41	55	.	4	*3b* ○	No.
40	55	.	5	63	33	.	4	58	38	.	4	*3c* ○	I don't know.
													If you answered "Yes," go on to the following item. Otherwise, skip to page 12, Consumer Satisfaction.
												4.	How did you learn about the above sanction(s)? Fill in all that apply.
1	.	95	5	3	.	92	5	2	.	93	5	*4a* ○	A written statement given out to all persons applying for admission.
1	.	95	5	3	.	92	5	2	.	93	5	*4b* ○	A written statement given out to all enrolled students.
.	.	95	5	2	1	92	5	2	1	93	5	*4c* ○	Read about it in a school newspaper or some other school-wide publication.
.	.	95	5	2	1	92	5	2	1	93	5	*4d* ○	From a source outside the school.
1	.	95	5	3	.	92	5	2	.	93	5	*4e* ○	None of the above.
1	.	95	5	2	1	92	5	2	1	93	5	*4f* ○	I don't know.

CONSUMER SATISFACTION

Occupational Training Institutions %				Degree-Granting Institutions %				All Institutions %						
0	1	8	9	0	1	8	9	0	1	8	9			
												1.		What is your overall satisfaction with the quality of the education you are receiving at this school? Fill in one only.
65	33	.	2	60	39	.	1	62	37	.	1	1a	○	Highly satisfied.
62	36	.	2	58	41	.	1	59	40	.	1	1b	○	Moderately satisfied.
82	16	.	2	87	12	.	1	86	13	.	1	1c	○	Partially satisfied.
86	12	.	2	92	7	.	1	90	8	.	1	1d	○	Not satisfied.
96	2	.	2	98	1	.	1	98	1	.	1	1e	○	Don't know.
												2.		What is your overall rating of this school's effectiveness in protecting your rights as a consumer of education? Fill in one only.
72	23	.	5	69	30	.	1	70	28	.	2	2a	○	Highly effective.
63	32	.	5	63	36	.	1	63	35	.	2	2b	○	Moderately effective.
83	12	.	5	80	19	.	1	81	17	.	2	2c	○	Partially effective.
83	13	.	5	91	7	.	1	89	9	.	2	2d	○	Not effective.
80	15	.	5	92	7	.	1	89	9	.	2	2e	○	Don't know.
												3.		Please rate your own knowledge of your consumer rights as a student at this school. Fill in one only.
75	17	.	8	89	10	.	1	85	12	.	3	3a	○	I am not aware of any rights I have.
71	21	.	8	72	27	.	1	72	25	.	3	3b	○	I am slightly aware of my rights.
60	31	.	8	58	41	.	1	58	39	.	3	3c	○	I am moderately aware of my rights.
69	22	.	8	77	22	.	1	75	22	.	3	3d	○	I am well aware of my rights.

APPENDIX I

IRF CODING, EDITING AND WEIGHTING SPECIFICATIONS

Field Name	Length	Raw Line/Bytes	Merged Bytes	Coding and Editing
School ID	11	1/1-11	1-11	bytes 1-2 state city code (geographical region) 01 = San Francisco 02 = Los Angeles 03 = Minneapolis 04 = St. Paul 05 = Kansas City 06 = St. Louis byte 3 ownership status 1 = public 2 = private, non-profit, non-religious affiliated 3 = private, non-profit, religious affiliated 4 = proprietary byte 4 school type 1 = occupational/vocational programs only 2 = 2 year degree-granting with some occupational/vocational programs 3 = 2 year degree-granting with no occupational/vocational programs 4 = 4 year degree-granting (may or may not include occupational/vocational programs) byte 5 school size 1 = enrolled first year students < 25 2 = enrolled first year students 26-100 3 = enrolled first year students 101-250 4 = enrolled first year students 251-1000 5 = enrolled first year students >1000 byte 6-10 sequential numeric code (00001-nnnnn) unique for each school byte 11 data source code 1 = data obtained from public documents only 2 = data obtained from documents plus personal interview 3 = data validity checked by second interviewer
Topic 1 - Refund Policies and Procedures				yes = '1', no = '0', no response = '9'
Items 1a-1e	5	1/12-16	12-16	-if none are marked, code '9' to all 2a-4f and go to topic 2 -if all 1a-1e are NO, code '8' to all 2a-4f and go to topic 2 -if all 1a-1e are NO or no response, code '9' to all 2a-4f and go to topic 2
Item 2a	1	1/17	17	-if no response, code '9' to all 3a-4f and go to topic 2 -if NO, code '8' to all 3a-4f and go to topic 2
Items 3a-3d	4	1/18-21	18-21	-code as marked
Items 4a-4f	6	1/22-27	22-27	-code as marked
Topic 2 - Advertising Practices				yes = '1', no = '0', no response = '9'
Items 1a-1d	4	1/28-31	28-31	-code as marked
Items 2a-2f	6	1/32-37	32-37	-code as marked
Items 3a-3b	2	1/38-39	38-39	-no non-response allowed unless both are non-response, else code a single non-response as NO('0')
Topic 3 - Admissions Policies				yes = '1', no = '0', no response = '9'
Item 1a	1	1/40	40	-if no response, code '9' to all 2a-2c; go to 3a -if NO, code '8' to 2a-2c; go to 3a
Items 2a-2c	3	1/41-43	41-43	-code as marked
Item 3a	1	1/44	44	-if no response, code '9' to 4a-4c; go to 5a -if NO, code '8' to 4a-4c; go to 5a
Items 4a-4c	3	1/45-47	45-47	-code as marked
Item 5a	1	1/48	48	-if "no stated admissions policy," code '8' to 6a-6c and go to topic 4 -if no response, code '9' to 6a-6c, go to topic 4 -if NO, code '8' to 6a-6c and go to topic 4
Items 6a-6c	3	1/49-51	49-51	-code as marked

Weighting - Item Responses

Note: yes, no, and '8' (directed nonresponse) are in n and weight

1a-1e not weighted

2a NO = 2 plus 1 for each YES option above two in 1a-1e; YES = 0

	NO	YES	8		NO	YES	8
3a(1)	2	0	0	4c(7)	1	0	0
3b(2)	2	0	0	4d(8)	0	0	0
3c(3)	1	0	0	4e(9)	0	1	0
3d(4)	0	0	0	4f(10)	1	0	0
4a(5)	2	0	0				
4b(6)	1	0	0				

	YES	NO	8		YES	NO	8
1a(1)	2	0	0	2b(6)	1	0	0
1b(2)	1	0	0	2c(7)	1	0	0
1c(3)	1	0	0	2d(8)	1	0	0
1d(4)	2	0	0	2e(9)	1	0	0
2a(5)	2	0	0	2f(10)	1	0	0

3a and 3b treated as one item

NO,NO = 3 YES,YES = 0

YES,NO = 1 NO,YES = 0

	YES	NO	8
1a(1)	1	0	0
2a(2)	3	0	0
2b(3)	2	0	0
2c(4)	0	0	0
3a(5)	0	3	0
4a(6)	0	1	0
4b(7)	0	1	0
4c(8)	0	1	0
5a(9)	not weighted		
6a(10)	0	1	0
6b(11)	0	1	0
6c(12)	0	1	0

Field Name	Length	Raw Line/Bytes	Merged Bytes	Coding and Editing	Weighting - Item Responses
Topic 4 - Instructional Staff				yes = '1', no = '0', no response = '9'	NO YES 8 NO YES 8 1a(1) 3 0 0 2a,2b,2d,2e - treat as one item - less than 3 NO's = 0, three NO's = 1, four NO's = 2 2c(4) 2 0 0 2f(7) omit from weighting 3a(8) 3 0 0 4c(11) 1 0 0 4a(9) 1 0 0 4d(12) 1 0 0 4b(10) 1 0 0
Item 1a	1	1/52	52	-if "no formal review," code '8' to 1a	
Items 2a-2f	6	1/53-58	53-58	-if 2c is no response, code '9' to 3a-4d, go to topic 5 -code 2f as '9' (omit from weights) -if 2c is NO, code '8' to 3a-4d, go to topic 5	
Item 3a	1	1/59	59	-if no response, code '9' to 4a-4d, go to topic 5 -if NO, code '8' to 4a-4d, go to topic 5	
Items 4a-4d	4	1/60-63	60-63	-code as marked	
Topic 5 - Written Disclosure				yes = '1', no = '0', no response = '9'	NO YES 8 1a-1y .5 0 0 2a-2b(1-2) 1 0 0 2c-2j(3-10) .5 0 0 3a(11) not weighted 4a(12) 2 0 0 5a(13) not weighted 6a-6g(14-20) 1 0 0
Items 1a-1y	25	1/64-88	64-88	-code as marked	
Items 2a-2j	10	1/89-98	80-98	-code 'do not exist' as '8' in 2a-2j	
Item 3a	1	1/99	99	-if no response, code '9' to 4a and go to 5a -if NO, code '8' to 4a and go to 5a	
Item 4a	1	1/100	100	-code as marked	
Item 5a	1	1/101	101	-if no response, code '9' to all 6a-6g, go to topic 6 -if NO, code '8' to 6a-6g, go to topic 6	
Items 6a-6g	7	1/102-108	102-108	-code as marked	
Topic 6 - Student Orientation				yes = '1', no = '0', no response = '9'	NO YES 8 1a(1) 3 0 0 2a-2d(2-5) 1 0 0
Item 1a	1	1/109	109	-if no response, code '9' to 2a-2d, go to topic 7 -if NO, code '8' to 2a-2d, go to topic 7	
Items 2a-2d	4	1/110-113	110-113	-code as marked	
Filler	6	1/114-119	does not exist	leave blank	
Record ID	1	1/120	does not exist	code as '1'	
School ID	11	2/1-11	does not exist	code as in record '1' above	
Topic 7 - Job Placement				yes = '1', no = '0', no response = '9'	NO YES 8 NO YES 8 1a(1) not weighted 2e(6) 0 1 0 2a(2) 0 1 0 2f(7) 0 1 0 2b(3) 1 0 0 2g(8) 1 0 0 2c(4) 1 0 0 2h(9) not weighted 2d(5) 1 0 0 3a(10) 1 0 0 3b(11) 2 0 0 3c(12) 1 0 0 4a and 4b treated as one item NO,NO = 2; YES,NO = 1; YES,YES = 0; NO,YES = 0
Item 1a	1	2/12	114	-if NO, code '8' to 2a-2h, go to 3a -if no response, code '9' to 2a-2h, go to 3a	
Items 2a-2h	8	2/13-20	115-122	-code as marked; code 2h as '9'	
Items 3a-3c	3	2/21-23	123-125	-if 'no students', code '8'	
Items 4a-4b	2	2/24-25	126-127	-code as marked	
Topic 8 - Recordkeeping Practices				yes = '1', no = '0', no response = '9'	NO YES 8 NO YES 8 1a(1) 1 0 0 1e(5) 1 0 0 1b(2) 1 0 0 1f(6) not weighted 1c(3) 1 0 0 2a(7) 3 0 0 1d(4) 1 0 0
Items 1a-1f	6	2/26-31	128-133	-code as marked; code 1f as '9'	
Item 2a	1	2/32	134	-code as marked	
Topic 9 - Stability of Instructional Staff				yes = '1', no = '0', no response = '9'	
Item 1a	3	2/33-35	135-137	-code in actual number 000 ≤ N ≤ 989 -code '999' if no response	1a - not weighted
Item 2a	3	2/36-38	138-140	-code actual percentage 000 ≤ P ≤ 100 -code '999' if no response	2a - 0% = 0 2-5% = 2 1-2% = 1 ≥ 5% = 3
Item 3a	1	2/39	141	-code as marked	3a - NO = 0 YES = 2 8 = 0
Topic 10 - Representation of Status				yes = '1', no = '0', no response = '9'	NO YES 8 1a(1) 0 1 0 1b(2) 0 1 0 1c(3) 0 1 0 2a(4) 2 0 0 2b(5) 1 0 0 3a(6) 3 0 0
Items 1a-1c	3	2/40-42	142-144	-if no response to all 1a-1c, code '9' to 2a-2b, go to 3a -if NO to all 1a-1c, code '8' to 2a-2b, go to 3a -if any YES, go to 2a -else code '9' to 2a-2b and go to 3a	
Items 2a-2b	2	2/43-44	145-146	-code as marked	
Items 3a	1	2/45	147	-code as marked	

Field Name	Length	Raw Line/Bytes	Merged Bytes	Coding and Editing	Weighting - Item Responses
Topic 11 - Financial Stability				yes = '1', no = '0', no response = '9'	treat 1a & 1b as one item, 1c & 1d as one item: NO,NO = 2; YES,NO = 1; YES,YES = 0; NO,YES = 0 NO YES 8 2a(1) not weighted 3a(2) 2 0 0 4a(3) 0 2 0 5a(4) 0 3 0 6a(5) 2 0 0 6b(6) 2 0 0
Items 1a-1d	4	2/46-49	148-151	-code as marked	
Item 2a	1	2/50	152	-if YES, code '8' to 3a-6b, go to topic 12	
Item 3a	1	2/51	153	-code as marked	
Item 4a	1	2/52	154	-code as marked	
Item 5a	1	2/53	155	-if no response, code '9' to 6a-6b, go to topic 12 -if NO, code '8' to 6a-6b, go to topic 12	
Items 6a-6b	2	2/54-55	156-157	-code as marked	
Topic 12 - Instructional Programs				yes = '1', no = '0', no response = '9', not required = '8'	treat 1a & 1b as one item: NO,NO = 3; YES,NO = 1; YES,YES = 0; NO,YES = 0 treat 2a & 2b as one item: NO,NO = 2; YES,NO = 1; YES,YES = 0; NO,YES = 0 NO YES 8 3a(1) 2 0 0 4a(2) 2 0 0 5a(3) 2 0 0 6a(4) 2 0 0 7a(5) 2 0 0 8a(6) 2 0 0
Items 1a-1b	2	2/56-57	158-159	-if no response to both, code '9' to 2a-2b, go to 3a -if NO to both, code '8' to 2a-2b, go to 3a -if NO and no response, code '9' to 2a-2b, go to 3a	
Items 2a-2b	2	2/58-59	160-161	-code as marked	
Item 3a	1	2/60	162	-code as marked	
Item 4a	1	2/61	163	-code as marked	
Item 5a	1	2/62	164	-code as marked	
Item 6a	1	2/63	165	-code as marked	
Item 7a	1	2/64	166	-code as marked	
Item 8a	1	2/65	167	-code as marked	
Topic 13 - Instructional Facilities				yes = '1', no = '0', no response = '9'	NO YES 8 1a(1) 2 0 0 treat 2a & 2b as one item: NO,NO = 2; YES,NO = 1; YES,YES = 0; NO,YES = 0 3a(2) 2 0 0 4a(3) 2 0 0
Item 1a	1	2/66	168	-if no response, code '9' to 2a-2b, go to 3a -if NO, code '8' to 2a-2b, go to 3a	
Items 2a-2b	2	2/67-68	169-170	-code as marked	
Item 3a	1	2/69	171	-code as marked	
Item 4a	1	2/70	172	-code as marked	
State Rating 4 fields, each F2.0 (PIC'99')	8	2/71-78	173-180	-field planned but never used	
No. of Students F4.0 or PIC '9999'	4	2/79-82	181-184	-number of 1st year students 0 ≤ n ≤ 9998 -unknown, code 9999	
Accreditation	1	2/83	185	-0 = not accredited; 1 = accredited; 9 = unknown	
Age of School	1	2/84	186	0 = <1 year; 2 = 2-5 years; 4 = 11-25 years; 9 = unknown; 1 = 1 year-2years; 3 = 5-10 years; 5 = > 25 years	
Filler	35	2/85-119	does not exist	- leave blank	
Record ID	1	2/120	does not exist	-code as '2'	

APPENDIX J

ESQ CODING, EDITING AND WEIGHTING SPECIFICATIONS

Field Name	Length	Bytes	Coding	Weighting
			Note: For all item responses: marked = 1; unmarked = 0;	
Student Information				
School Data	7	1-7	-code as blanks	
School ID	2	8-9	-sequential numeric code geared to IRF assignments	
Student ID	5	10-14	-sequential numeric code within schools	
1)Still Enrolled	1	15	-yes = 1, no = 0, no response = 0; if NO or no response, code '9' to A4 & A5	
2)Months Attended	2	16-17	-code actual number 0 ≤ n ≤ 98; no response = 99	
3)No. of Schools	2	18-19	-code actual number 0 ≤ n ≤ 98; no response = 99	
4)Status	1	20	-parttime = 1; fulltime = 2; no response = 9	
5)Resident	1	21	-resident = 1; nonresident = 0; doesn't know = 8; no response = 9	
6)Sex	1	179	-male = 1; female = 2; no response = 9; more than one response = 9	
				NOTE: For all item responses, '9' not included in n; unmarked ('0') and '8' are included in n with weight of zero.
Topic 1 - Refund Policies and Procedures				
Items 1a-1e	5	22-26	-if all unmarked, code '9' to 1a-4f and go to topic 2 -if any 1a-1c are marked, code '0' to 1d and 1e, go to 2a -else, code '8' to 2a-4f and go to topic 2	1a-1e: not weighted
Items 2a-2c	3	27-29	-if all are unmarked or more than one is marked, code '9' to 2a-4f and go to topic 2 -if only 2a is marked, code '0' to 2b-2c and go to 3a -else, code '8' to 3a-4f and go to topic 2	2a(6) - 0 2b(7) - 2 2c(8) - not weighted 3a(9) - 0 3b(10)- 0 3c(11)- 0 3d(12)- 3 3e(13)- not weighted 4a(14) - 0 4b(15) - 0 4c(16) - 0 4d(17) - 0 4e(18) - 2 4f(19) - not weighted
Items 3a-3e	5	30-34	-if all are unmarked, code '9' to 3a-3e, go to 4a -if any of 3a-3c are marked, code '0' to 3d-3e and go to 4a	
Items 4a-4f	6	35-40	-if none are marked, code '9' to 4a-4f -if any one of 4a-4e are marked, code '0' to 4f -if more than one of 4a-4e are marked, code '9' to 4a-4f	
Topic 2 - Recruiting and Admissions				
Items 1a-1e	5	41-45	-if none are marked, code '9' to 1a-1e -if any of 1a-1d are marked, code '0' to 1e	1a(1) - 0 1b(2) - 0 1c(3) - 0 1d(4) - 0 1e(5) - 2 2a(6) - 0 2b(7) - 0 2c(8) - 0 2d(9) - 0 2e(10)- 2 2f(11)-not weighted
Items 2a-2f	6	46-51	-if none are marked, code '9' to 2a-2f -if any 2a-2d are marked, code '0' to 2e-2f	
Topic 3 - Instructional Staff				
Items 1a-1d	4	52-55	-if none are marked, code '9' to all 1a-3d and go to topic 4 -if a YES is marked, code '0' to 1c-1d, go to 2a -if 1c or 1d is marked, code '8' to 2a-3d, go to topic 4	1a(1) - 0 1b(2) - 0 1c(3) - 2 1d(4) - not weighted 2a(5) - 0 2b(6) - 0 2c(7) - 1 2d(8) - not weighted 3a(9) - 0 3b(10)- 0 3c(11)- 1 3d(12)- not weighted
Items 2a-2d	4	56-59	-if none are marked, code '9' to all 2a-2d -if any YES are marked, code '0' to 2c-2d	
Items 3a-3d	4	60-63	-if none are marked,code '9' to all 3a-3d -if any YES are marked, code '0' to 3c-3d	
Topic 4 - Written Disclosure				
Items 1a-1g	7	64-70	-if none are marked or more than one is marked, code '9' to 1a-1g	1a(1) - 0 1b(2) - 0 1c(3) - 1 1d(4) - 0 1e(5) - 1 1f(6) - 3 1g(7) - not weighted 2a(8) - not weighted 2b(9) - not weighted 2c(10)- not weighted 3a(11)- 0 3b(12)- 0 3c(13)- 0 3d(14)- 0 3e(15)- 0 3f(16)- 0 3g(17)- 3 3h(18)- not weighted
Items 2a-2c	3	71-73	-if none are marked or more than one is marked, code '9' to 2a-3h and go to topic 5 -if YES is marked, go to 3a -else, code '8' to 3a-3h and go to topic 5	
Items 3a-3h	8	74-81	-if none are marked, code '9' to all 3a-3h -if any of 3a-3f are marked, code '0' to 3g-3h	

Field Name	Length	Bytes	Coding	Weighting
Topic 5 - Student Orientation				
Items 1a-1c	3	82-84	-if none or more than one are marked, code '9' to 1a-3g, go to topic 6 -if YES is marked, go to 2a -else, code '8' to 2a-3g and go to topic 6	1a(1) - 0 1b(2) - 3 1c(3) - not weighted 2a(4) - 0 2b(5) - 0 2c(6) - 0 2d(7) - 0 2e(8) - 2 2f(9) - not weighted 3a(10) - 0 3b(11) - 0 3c(12) - 0 3d(13) - 0 3e(14) - 0 3f(15) - 2 3g(16) - not weighted
Items 2a-2f	6	85-90	-if none are marked, code '9' to 2a-3g, go to topic 6 -if any of 2a-2d are marked, code '0' to 2e-2f -if 2a is marked, go to 3a -else, code '8' to 3a-3g and go to topic 6	
Items 3a-3g	7	91-97	-if none are marked, code '9' to 3a-3g -if any 3a-3e are marked, code '0' to 3f-3g	
Topic 6 - Equipment and Facilities				
Items 1a-1d	4	98-101	-if none or more than one are marked, code '9' to 1a-1d	1a(1) - 2 1b(2) - 1 1c(3) - 0 1d(4) - not weighted 2a(5) - 2 2b(6) - 1 2c(7) - 0 2d(8) - not weighted 3a(9) - not weighted 3b(10)- not weighted 3c(11)- not weighted 4a(12)- 0 4b(13)- 1 4c(14)- not weighted
Items 2a-2d	4	102-105	-if none or more than one are marked, code '9' to 2a-2d	
Items 3a-3d	3	106-108	-if none or more than one are marked, code '9' to 3a-4c, go to topic 7 -if YES is marked, go to 4a -else, code '8' to 4a-4c and go to topic 7	
Items 4a-4c	3	109-111	-if none or more than one are marked, code '9' to 4a-4c	
Topic 7 - Job Placement Service				
Items 1a-1d	4	112-115	-if none or more than one are marked, code '9' to 1a-2h, go to topic 8 -if YES is marked, go to 2a -else, code '8' to 2a-2h and go to topic 8	1a(1) - 1 1b(2) - 0 1c(3) - 0 1d(4) - not weighted 2a(5) - 0 2b(6) - 0 2c(7) - 0 2d(8) - 0 2e(9) - 0 2f(10)- 2 2g(11)- 1 2h(12)- not weighted
Items 2a-2h	8	116-123	-if none are marked, code '9' to 2a-2h -if any 2a-2f are marked, code '0' to 2g-2h	
Topic 8 - Advertising Practices				
Items 1a-1e	5	124-128	-if none are marked, code '9' to 1a-1e -if any of 1a-1d are marked, code '0' to 1e	1a(1) - 2 1b(2) - 2 1c(3) - 2 1d(4) - 1 1e(5) - 0 2a(6) - 3 2b(7) - 2 2c(8) - 2 2d(9) - 1 2e(10)- 1 2f(11)- 0 2g(12)- not weighted
Items 2a-2g	7	129-135	-if none are marked, code '9' to all 2a-2g -if any of 2a-2e are marked, code '0' to 2f-2g	
Topic 9 - Staff Stability				
Items 1a-1h	8	136-143	-if none or more than one are marked, code '9' to 1a-1h	1a(1) - 0 1b(2) - 2 1c(3) - 2 1d(4) - 3 1e(5) - 3 1f(6) - 4 1g(7) - 4 1h(8) - not weighted 2a(9) - 3 2b(10)- 0 2c(11)- not weighted
Items 2a-2c	3	144-146	-if none or more than one are marked, code '9' to 2a-2c	
Topic 10 - Status Representation				
Items 1a-1c	3	147-149	-if none or more than one are marked, code '9' to 1a-2f, go to 3a -if YES marked, go to 2a -else, code '8' to 2a-2f and go to 3a	1a(1) - not weighted 1b(2) - not weighted 1c(3) - not weighted 2a(4) - 0 2b(5) - 0 2c(6) - 1 2d(7) - 3 2e(8) - not weighted 2f(9) - not weighted 3a(10)- not weighted 3b(11)- not weighted 3c(12)- not weighted 4a(13)- 0 4b(14)- 0 4c(15)- 1 4d(16)- 3 4e(17)- not weighted 4f(18)- not weighted
Items 2a-2f	6	150-155	-if none are marked, code '9' to 2a-2f -if any of 2a-2d are marked, code '0' to 2e-2f	
Items 3a-3c	3	156-158	-if none are marked, code '9' to all 3a-4f, go to topic 11 -if YES marked, go to 4a -else, code '8' to 4a-4f and go to topic 11	
Items 4a-4f	6	159-164	-if none are marked, code '9' to 4a-4f -if any of 4a-4d are marked, code '0' to 4e-4f	
Topic 11 - Consumer Satisfaction				The Topic 11 item responses are weighted differently than those of other topics. Three separate scores are developed as follows:
Items 1a-1e	5	165-169	-if none or more than one are marked, code '9' to 1a-1e	If 1a = 1 then Score 1 = 0. If 1b = 1 then Score 1 = 1. If 1c = 1 then Score 1 = 2. If 1d = 1 then Score 1 = 3. If 1e = 1 then Score 1 = 8. Else Score 1 = 9.
Items 2a-2e	5	170-174	-if none or more than one are marked, code '9' to 2a-2e	If 2a = 1 then Score 2 = 0. If 2b = 1 then Score 2 = 1. If 2c = 1 then Score 2 = 2. If 2d = 1 then Score 2 = 3. If 2e = 1 then Score 2 = 8. Else Score 2 = 9.
Items 3a-3d	4	175-178	-if none or more than one are marked, code '9' to 3a-3d	If 3a = 1 then Score 3 = 3. If 3b = 1 then Score 3 = 2. If 3c = 1 then Score 3 = 1. If 3d = 1 then Score 3 = 0. Else Score 3 = 9.

APPENDIX K

GLOSSARY OF ABBREVIATIONS USED IN REPORT

AIES - Accreditation and Institutional Eligibility Staff (now DEAE)
AIR - American Institutes for Research
BEOG - Basic Educational Opportunity Grant
CWS - College Work Study
DHEW - Department of Health, Education and Welfare
DEAE - Division of Eligibility and Agency Evaluation (formerly AIES)
ECS - Education Commission of the States
ESQ - Enrolled Student Questionnaire
FICE - Federal Interagency Committee on Education
FTC - Federal Trade Commission
GSL - Guaranteed Student Loan
HEGIS - Higher Education General Information Survey
ICAS - Information Collection, Analysis and Sharing System
IRF - Institutional Report Form
NACEPD - National Advisory Council on Education Professions Development
NCES - National Center for Educational Statistics
NCS - National Computer Systems
NDSL - National Defense Student Loan
OCA - Office of Consumer Affairs, DHEW
OMB - Office of Management and Budget
SPSS - Statistical Package for the Social Sciences
SEOG - Supplementary Educational Opportunity Grant
USOE - United States Office of Education
VA - Veterans Administration

APPENDIX L

Research Advisory Panel

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Professor of Political Science and
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APPENDIX M

INSTITUTIONAL REPORT FORM:

AN INTERVIEW GUIDE

for

Postsecondary Occupational Training

Institutions/Programs

developed by

The American Institutes for Research
P.O. Box 1113
Palo Alto, California 94302
(415) 493-3550

1 September 1976

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Introduction

This form is designed to serve as the basis for on-site assessments of the consumer protection policies and practices of postsecondary educational institutions. It is meant to be used by officials of government regulatory agencies or by members of non-governmental accreditation teams in conjunction with their inspection visits to institutions which are eligible for or are applying for eligibility for federal student assistance programs. The uses of the items in this form and their scoring and analysis procedures are described in separate users' guides; these guides should be studied in detail before attempting any institutional assessments.

Some of the items in this form may be completed on the basis of an interview with officials of an institution to be assessed. Other items require that you acquire and read the institution's catalog, certain written policy statements (if they are available), and representative advertising copy (if available). Depending on the size of the institution and its complexity, completing the form will take from under 30 minutes to over two hours.

One purpose of the form is to stimulate an institution's own efforts to protect the consumer rights of its students and prospective students. No institution is perfect in this regard. Therefore, you are urged to share all questions with officials of the institution being assessed; this sharing can help them to bring about any needed improvements voluntarily.

Each topic in the form is introduced by a brief rationale explaining the nature of the potential abuse it is designed to detect. Where there may be questions about the meaning of an item, interviewer notes are inserted. Most item response options include a provision for cases where the item is not applicable to the institution being assessed; as a general rule, if "not applicable" response options are not provided, and the item does not apply, leave the item blank. However, omissions should be avoided whenever possible.

Refund Policies and Practices

Rationale for this topic: One of the most common sources of student complaints about postsecondary educational experiences is institutional failure to refund tuition and fee payments. Institutions are clearly justified in requiring advance tuition and fee payments and retaining a portion of these payments to cover processing costs in the event a student withdraws for reasonable cause. However, it is generally agreed that all institutions should have a written refund policy stating clearly when and under what conditions refunds will be granted and should make timely refunds (without inordinate delay) to students who abide by stated institutional policy. There is less general agreement but strong support for "pro rata" refund policies, in which students receive a refund equal in proportion to the percentage of prepaid instruction they did not receive, minus a fair amount to reimburse institutional processing costs.

1. Does this institution require students to pay or otherwise obligate to pay any of the following fees or charges in advance of enrollment or class attendance? Fill in one oval for each option.

	No	Yes	
1a	○	○	Resident tuition or tuition generally applicable to all students.
1b	○	○	Non-resident tuition or tuition paid only by certain groups of students.
1c	○	○	Room and board charges or deposits.
1d	○	○	Application or registration fees in excess of $50.
1e	○	○	Other required student fees in excess of $50 (excluding books).

If you filled in "no" to all the options above, skip the following three items and go on to page 4, Advertising Policies and Practices.

2. Does this institution have a written refund policy regarding all those fees for which "yes" was checked in item 1? Fill in one oval.

	No	Yes
2a	○	○

If you filled in "no" to item 2 above, skip the following two items and go on to page 4. Advertising Policies and Practices.

3. How is the written refund policy made available to students? Fill in one oval for each option.

	No	Yes	
3a	○	○	It is made available for public inspection at the institution.
3b	○	○	It is printed in the school's general catalog or bulletin.
3c	○	○	It is distributed to all enrolled students.
3d	○	○	It is distributed to all prospective students.

4. Does this institution's written refund policy specify the following items? Fill in one oval for each option, after reading the policy statement.

	No	Yes	
4a	○	○	Those fees and charges which are not refundable.
4b	○	○	All conditions which students must meet to obtain refunds.
4c	○	○	How to properly apply for a refund.
4d	○	○	A refund formula by which students pay, in effect, only for the instruction they have actually had the opportunity to receive.
4e	○	○	Any non-refundable application processing fee or other types of non-refundable student fees exceeding $50.
4f	○	○	A limitation on the time allowed between receipt of a valid refund request and the issuance of a refund.

Rationale for item 4: These are aspects of a refund policy which are desirable for all institutions which collect fees in advance. Students need to know when they qualify for a refund and how they must apply for it. Also, students should be able to assume that institutions will process valid refund requests within a reasonable period of time. Large non-refundable application or processing fees should be avoided and should never be applied without ample advance notice to enrollees and students. "Pro rata" tuition refund policies are required for veterans receiving benefits from the Veterans Administration and are imposed on proprietary schools in some states to curb the use of "hard sell" techniques by sales representatives.

Advertising Policies and Practices

Rationale for this topic: More and more schools are using advertising as a technique to increase enrollments. Abusive advertising occurs when false, misleading, or unsubstantiated claims are made, whether or not the abuse is intentional. All institutions which use the public media in attempting to attract students should be aware that certain specific practices (which are in fact illegal in a number of states) involve a potential for abuse. If the institution chooses to use them anyway, regulatory bodies and consumers should be made aware of the fact. Further, the Chief Executive Officer of an institution should be responsible for the advertising practices of that institution. If advertising is released without the director's review, especially by personnel who stand to gain from increased enrollment, there is a higher probability that misleading advertising will result.

1. Does this institution use the following advertising techniques in attracting applicants for admission? Fill in one oval for each option, after reading a representative sample of the institution's advertising, if possible.

	No	Yes	
1a	○	○	Classified ads in the "Help Wanted" section of the newspaper, not for employed positions at the institution, but to obtain "leads" on potential students.
1b	○	○	Competitions or contests in which virtually everyone "wins," designed only to stimulate enrollments.
1c	○	○	Testimonials or endorsements by persons who did not, in fact, attend this institution.
1d	○	○	Offers of limited time "discounts" on tuition charges, room and board charges, etc.

2. Does this institution make the following statements in any of its advertising? Fill in one oval for each option, after reading a representative sample of the institution's advertising, if possible.

	No	Yes	This institution does no advertising of any type (including professional journal or telephone directory notices). ↓	
2a	○	○	○	Completing the education or training offered at this institution guarantees employment.

	No	Yes	This institution does no advertising of any type (including professional journal or telephone directory notices).	
2b	○	○	○	Completing the education or training offered at this institution is likely to lead to employment, without presenting accurate supporting data.
2c	○	○	○	There are ties or connections between this institution and specific employers which will result in special employment considerations for graduates, when in fact there are no such ties.
2d	○	○	○	Scholarships or other forms of no-cost financial assistance are available, when in fact they have not been awarded during the past year.
2e	○	○	○	The educational program is superior to the educational program offered at competing institutions.
2f	○	○	○	Recognized experts or other types of well-known persons are on the teaching faculty, when in fact they have no teaching responsibilities.

3. Does a responsible administrative officer of this institution (or higher administrative level, for example, district or corporate office) review advertising copy before it is released? Fill in one oval for each option.

	No	Yes	This institution does no advertising of any type (including professional journal or telephone directory notices).	
3a	○	○	○	Some or most of it.
3b	○	○	○	All of it.

Admissions Practices

Rationale for this topic: There is a fine line between innovative, active admissions practices and abusive admissions practices. The latter are one of the most frequently cited topics of student complaints, yet active recruitment is becoming more and more essential for institutional survival in this time of declining enrollments. The present topic area attempts to inquire about techniques which have a high potential for causing abuse, as judged by common sense, recent literature, and documented student complaints.

1. Does this institution employ admissions representatives whose compensation or salary is based wholly or in part on commissions? Fill in one oval.

	No	Yes
1a	○	○

If you filled in "no" to item 1 above, skip item 2 and go on to item 3.

2. How are these commissions calculated? Fill in one oval for each option.

	No	Yes	
2a	○	○	They are based on the number of students enrolled.
2b	○	○	They are based on the number of students enrolled who actually attend classes.
2c	○	○	They are based on the number of students enrolled who graduate.

3. Does this institution have a written policy which governs recruiting and/or admissions practices? Fill in one oval.

	No	Yes
3a	○	○

If you filled in "no" to item 3 above, skip item 4 and go on to item 5.

4. Does this institution's written recruiting and/or admissions policy specify the following items? Fill in one oval for each option, after reading the policy statement.

	No	Yes	
4a	○	○	A code of ethics which prohibits certain recruiting/admissions practices.

	No	Yes	
4b	○	○	A requirement that prospective students talk to a staff member, at the institution, prior to enrolling.
4c	○	○	The completion of a signed enrollment agreement which describes costs, payment requirements, and educational services to be provided by the institution.

5. Does this institution have a policy of regularly admitting students who do not meet stated admissions requirements? Fill in one oval.

	No	Yes	This institution has no stated admissions requirements.
5a	○	○	○

If you filled in "no" or "no stated admissions requirements" to item 5 above, skip the following item and go on to page 8 , Instructional Staff Evaluation Practices.

6. For students who do not meet stated admissions requirements, but are admitted under a special admissions policy, are the following courses provided? Fill in one oval for each option.

	No	Yes	
6a	○	○	Courses or sections offering remedial instruction in basic English.
6b	○	○	Courses or sections offering remedial instruction in basic mathematics.
6c	○	○	Special academic tutoring programs offering remedial instruction related to students' needs.

Rationale for items 5 and 6: If an institution has an essentially "open" admissions policy, then it should also have remedial services to assist students who may be underqualified. Failure to do so may be taking unfair advantage of underqualified students in the pretense of "giving them an opportunity."

Instructional Staff Evaluation Practices

Rationale for this topic: Unqualified and unmotivated staff provoke many student complaints; but the determination of staff qualifications and motivation, like the determination of quality of educational program, is problematic and beyond the scope of this form. However, there appear to be certain steps which can be taken to evaluate and improve instructional staff. All institutions should carry out such steps as a matter of institutional policy.

1. Is teaching competence (no matter how it is evaluated) included as one criterion in the formal salary and/or tenure and/or rank review policies of this institution? Fill in one oval.

	No	Yes	This institution has no formal salary/tenure/rank review policies.
1a	○	○	○

2. Is teaching competence systematically evaluated by the following groups at this institution? Fill in one oval for each option.

	No	Yes	
2a	○	○	By administrative staff.
2b	○	○	By other faculty of the same department or program.
2c	○	○	By students.
2d	○	○	By graduates.
2e	○	○	By self-ratings.
2f		○	Other, please describe on the last page of the questionnaire.

If you filled in "no" to "by students" in item 2 above, skip the following two items and go on to page 10, Disclosure in Written Documents.

3. Are student evaluations of teaching faculty members conducted on a regular basis (for example, yearly, at the end of each course, etc.)? Fill in one oval.

	No	Yes
3a	○	○

If you filled in "no" to item 3 above, skip the following item and go on to page 10, Disclosure in Written Documents.

4. Does the system of evaluation of instructors by students include the following provisions? Fill in one oval for each option.

	No	Yes		
4a	○	○		Anonymous student responding.
4b	○	○		Objective student responding (for example, on machine scored answer sheets).
4c	○	○		Evaluations of all full-time faculty members.
			There are no part-time faculty members.	
4d	○	○	○	Evaluations of all part-time faculty members (for example, adjunct faculty members).

Disclosure in Written Documents

Rationale for this topic: Lack of adequate disclosure by an institution can be intentional or unintentional. If it is intentional and students are misled as a result, the result is consumer fraud. Much more common are situations in which lack of adequate disclosure is unintentional, and students make important decisions based on faulty or no information. Student anger when the true facts become known is no less justified under these circumstances than under circumstances of intentional fraud. All institutions should, as a routine policy, disclose certain important facts, both to prospective enrollees and already enrolled students. Nor should students have to exert unreasonable effort to seek out these facts; they should be written clearly, in common English, and handed, free, to all.

Interviewer note: The items below do not ask whether particular conditions or services exist at the institution, but whether their existence or non-existence is adequately disclosed in public documents.

1. Does this institution disclose information on the following topics in its general catalog, bulletin, or basic public information document or a combination of these? Fill in one oval for each option, after reading the appropriate documents.

	No	Yes	
1a	○	○	Name and address of school.
1b	○	○	Date of publication of the document.
1c	○	○	School calendar including beginning and ending dates of classes and programs, holidays, and other dates of importance.
1d	○	○	A statement of institutional philosophy and program objectives.
1e	○	○	A brief description of the school's physical facilities.
1f	○	○	An accurate list of all courses actually offered, or all subject areas actually taught if separate courses do not exist.
1g	○	○	An indication of when specific required courses will not be offered (if there are no "required" courses, fill in "yes").
1h	○	○	Educational content of each course, or of the program if separate courses do not exist.

	No	Yes	
1i	○	○	Number of hours of instruction in each course, or in the program if separate courses do not exist, and length of time in hours, weeks, or months normally required for its completion.
1j	○	○	An accurate listing of faculty who currently teach.
1k	○	○	An indication of the distinction between adjunct or part-time faculty and full-time faculty (if this distinction does not exist at this institution, fill in "yes").
1l	○	○	Policies and procedures regarding acceptability or non-acceptability of credits from other institutions.
1m	○	○	General acceptability or non-acceptability by other institutions of credits earned at this institution.
1n	○	○	Requirements for graduation.
1o	○	○	Statement of certificates or diplomas awarded upon graduation.
1p	○	○	Notice of all charges for which a student may be held responsible (if no charges exist at this institution, fill in "yes").
1q	○	○	Financial aid programs actually available to students, or instructions on how to obtain such information.
1r	○	○	Limitations on eligibility for financial aid programs, or instructions on how to obtain such information.
1s	○	○	Grading system.
			Policies relating to:
1t	○	○	Tardiness
1u	○	○	Absences
1v	○	○	Make-up work
1w	○	○	Student conduct
1x	○	○	Termination
1y	○	○	Re-entry after termination

2a. If there are any standard limitations on post-training employment opportunities for students at this institution (for example, medical or health requirements, professional licensing requirements, apprenticeships, age, experience, further training by employer, etc.), are these limitations disclosed in the basic public information document(s)? Fill in one oval.

	No	Yes	There are no standard limitations on post-training employment opportunities for students at this institution.
2a	○	○	○

2b. If this institution lacks specialized or professional course accreditation which is required for post-training employment of students, is this lack disclosed in the public information document(s)? Fill in one oval.

2b
- ○ The lack of specialized accreditation is not disclosed.
- ○ The lack of specialized accreditation is disclosed.
- ○ Specialized or professional course accreditation is not required for post-training employment in any of the courses of study offered at this institution, or all courses requiring specialized accreditation are so accredited.

2c-2g. Does this institution provide accurate descriptions of the availability and extent of the following student services in its basic public information document(s)? Fill in one oval for each option.

	No	Yes	No service of this type exists at this institution.	
2c	○	○	○	Job placement
2d	○	○	○	Student counseling
2e	○	○	○	Dining facilities (for example, a student cafeteria. Do not count vending machines.)
2f	○	○	○	Housing facilities
2g	○	○	○	Parking facilities

Note: Items 2h, 2i, and 2j, dealing with degree-granting practices, are omitted from this form.

3. Are increases in any student fees in excess of $25 currently planned to occur within the next year? Fill in one oval.

	No	Yes
3a	○	○

If you filled in "no" to item 3 above, skip item 4 and go on to item 5.

4. Are the planned fee increases disclosed in writing to all students and prospective enrollees to whom they might apply? Fill in one oval.

	No	Yes
4a	○	○

5. Does this institution make student loans, either directly from the institution or as a lender for one of the federal or state student loan programs? Fill in one oval.

	No	Yes
5a	○	○

If you filled in "no" to item 5 above, skip the following item and go on to page 14, Student Orientation Practices.

6. Do all applicants for student loans (excluding short-term or emergency loans) receive printed documents from the institution which disclose the following, before any repayment obligation begins? Fill in one oval for each option.

	No	Yes	
6a	○	○	The effective annual loan interest rate.
6b	○	○	Loan repayment obligations.
6c	○	○	The process for repayment of the loan.
6d	○	○	The length of time allowed for repayment.
6e	○	○	The procedure for renegotiating the repayment schedule for the loan or deferred fees.
6f	○	○	Procedures for deferment or cancellation of portions of the loan or deferred fees, if necessary.
6g	○	○	Procedures for loan or deferred fee collection which will be used in the event of failure to repay.

Student Orientation Practices

Rationale for this topic area: Institutions have a responsibility to engage in certain ***affirmative*** *student orientation practices to insure that newly enrolled students are aware of their rights and responsibilities. The orientation should especially include presentations by students who have been enrolled previously, so that they can share their experiences and acquired knowledge of the practices and policies of the institution.*

1. Does this institution conduct a program of orientation for incoming students? Fill in one oval.

	No	Yes
1a	○	○

If you filled in "no" to item 1 above, skip the following item and go on to page 15, Job Placement Services and Follow-Up of Graduates.

2. Does this student orientation include the following? Fill in one oval for each option.

	No	Yes	
2a	○	○	An orientation newsletter or student handbook.
2b	○	○	Oral presentations or written documents prepared by students who have attended the institution recently.
2c	○	○	Instructions on how and where to voice complaints and grievances.
2d	○	○	Instructions on how to obtain information on available student financial aid.

Job Placement Services and Follow-Up of Graduates

Rationale for this topic area: Two related topic areas are actually covered here. If institutions do not claim to offer placement assistance, it is of course not mandatory that they do so. If placement assistance is offered, it should consist of certain essential services lest it be nothing more than a shoddy sales gimmick. Regardless of whether or not placement assistance is offered, follow-through (or follow-up of graduates and alumni) is essential as a method for evaluating the relevance and effectiveness of an institution's educational programs. Sampling and new student follow-up techniques make such follow-through a possibility for all institutions.

1. Does this institution state that it offers job placement services or other placement assistance to students in finding jobs? Fill in one oval.

	No	Yes
1a	○	○

If you filled in "no" to item 1 above, skip item 2 and go on to item 3.

2. Does the placement assistance offered by this institution include the following aspects? Fill in one oval for each option.

	No	Yes	
2a	○	○	A fee for the assistance.
2b	○	○	Formal training in job-seeking and job-holding skills.
2c	○	○	Seeking out and/or contacting prospective employers.
2d	○	○	Making job interview appointments for individual students.
2e	○	○	Referral to a commercial placement service which charges a fee.
2f	○	○	Collation and distribution of "Help Wanted" ads from newspapers as the only placement assistance offered.
2g	○	○	Assistance in finding part-time jobs.
2h		○	Other, please describe in the space provided at the end of the form.

Rationale for item 2: Genuine placement assistance or service performs at least the minimal functions of job development (contacting prospective employers regarding possible openings), training in job seeking and maintenance skills, and scheduling interviews for students, for both part-time and full-time jobs. Any placement assistance or service which does not perform these functions is in danger of being a charade, and calling it "placement" is a potential abuse.

3. Does this institution systematically collect data on the employment success (however defined) of persons in its occupational or professional preparation programs? Fill in one oval for each option.

	No	Yes	This institution currently has no occupational or professional preparation students or graduates.	
3a	○	○	○	Former students who did not graduate.
3b	○	○	○	Recent graduates (within one year of graduation).
3c	○	○	○	Recent graduates (within five years of graduation).

Rationale for item 3: With the efficiency of modern sampling and follow-up techniques, even lack of a large budget is no excuse for not trying to collect some data on the ultimate desired outcome of occupational or professional preparation programs--employment success.

4. Does this institution systematically collect data on the numbers and characteristics of students who drop out of the school at the time they leave or soon thereafter? Fill in one oval for each option.

	No	Yes	
4a	○	○	For all students enrolled in occupational or professional preparation programs or majors.
4b	○	○	For all enrolled students regardless of program or major.

Recordkeeping Practices

Rationale for this topic: Institutions which do not adequately maintain student records in a central location make it extremely difficult for current and former students to access them when there is a need to do so. Moreover, if an institution should cease operations, lack of a record maintenance policy can cause great inconvenience and even abuse of current and former students, who are unable to secure necessary proof of their past education.

1. Are individual student records maintained which contain the following items? Fill in one oval for each option.

	No	Yes		
			No fees are charged by this institution.	
1a	○	○	○	Total fees paid by the student.
1b	○	○		Courses taken and completed or subject matter covered by the student.
			No internships or supervised practice are offered by this institution.	
1c	○	○	○	Internships or other forms of supervised professional practice.
1d	○	○		Academic credits, grades, or indicators of satisfactory progress earned by the student.
			No financial aid is offered by this institution directly.	
1e	○	○	○	Financial aid amounts, including loans received by the student directly from the institution, if any.
1f		○		Other, please describe in the space provided at the end of the form.

2. Does this institution have a written policy for maintaining, or arranging for maintenance of, individual student access to records for a period of at least two years in the event of a school closure or change of control? Fill in one oval.

	No	Yes
2a	○	○

Maintaining Stability of Instructional Staff

Rationale for this topic: One of the most disturbing educational experiences is the turnover of instructional staff during a course. Each turnover causes extreme disruption and loss of essential continuity. Furthermore, excessive staff instability is a probable indicator of deeper troubles in an institution.

1. During the previous calendar year, how many times was there an unscheduled, permanent change of instructor after instruction had begun (for reasons other than illness or death of original instructor)? Fill in the number; if none, enter as zero.

1a Number of times: ________

2. This represented what percentage of the total number of instructors teaching during that calendar year? Fill in the percentage; if none, enter as zero.

2a Percentage: ________

3. During the previous calendar year, did any unscheduled, permanent change of instructor occur in the same course or subject area twice or more often after instruction had begun? Fill in one oval.

	No	Yes
3a	○	○

Representation of Current Approved or Accredited Status

Rationale for this topic: Students should be accurately informed about the actual status of an institution or its programs with regard to state or veterans approval, private accreditation, and any pending legal actions. It is the responsibility of the institution to provide and not to misrepresent this information. Misrepresentation is a subtle abuse which may cause students to believe an institution has been evaluated and approved, when in fact it has not been.

1. Is this institution currently on suspension, probation, or some other form of limitation or sanction for noncompliance with designated standards, by any of the following government agencies? Fill in one oval for each option.

	No	Yes	
1a	○	○	A local government agency (for example, Consumer Protection Agency, District Attorney, etc.).
1b	○	○	A state government agency (for example, State Approving or Licensing Agency, Attorney General, etc.).
1c	○	○	A federal government agency (for example, Federal Trade Commission, Office of Guaranteed Student Loans/DHEW, etc.).

If you filled in "no" to all of the above options, skip item 2 and go on to item 3.

2. Are the facts of the above limitation(s) or sanction(s) publicly disclosed to enrolled students and prospective students? Fill in one oval for each option.

	No	Yes	
2a	○	○	In printed form to all enrolled students.
2b	○	○	In printed form to all prospective students.

3. Do the public representations of this institution clearly indicate (and distinguish between, where applicable) institutional accreditation, specialized or professional program accreditation, state VA-approving agency course approval, and state licensing and approval? Fill in one oval after reading the public information documents of the institution if possible.

	No	Yes	Not Applicable.
3a	○	○	○

Financial Stability

Rationale for this topic: As many regulatory bodies have discovered too late, it is very difficult to either measure or guard against financial instability in a postsecondary institution. However, certain practices are more likely than others to insure that institutions do not close down, leaving students with no recourse. Regulatory bodies should know about these practices in institutions for which they are responsible; consumers should also be aware of these practices.

1. Are the central financial records and reports of this institution regularly subjected to the following audits or inspections? Fill in one oval for each option.

	No	Yes	
1a	○	○	Uncertified audit by an accounting firm.
1b	○	○	Certified audit by an accounting firm.
1c	○	○	Inspection by a state regulatory or auditing agency.
1d	○	○	Inspection by a federal regulatory or auditing agency.

2. Is this a publicly-supported institution (that is, over 50% public funding)? Fill in one oval.

	No	Yes
2a	○	○

If you filled in "yes" to item 2 above, skip the following four items and go on to page 23, Occupational Instruction Programs.

3. Does this institution have a retained earnings fund, an endowment, or other reserve of funds or source of income to pay operating expenses not covered by current student tuition receipts? Fill in one oval.

	No	Yes
3a	○	○

4. Do the financial reporting practices of this institution report uncollected tuition as assets, without indicating an offsetting liability? Fill in one oval after looking at a current financial statement, if possible.

	No	Yes
4a	○	○

5. Is this institution currently engaged in bankruptcy proceedings, or is there any serious possibility that it might enter into bankruptcy proceedings during the next 12 months? Fill in one oval.

	No	Yes
5a	○	○

If you filled in "no" to item 5 above, skip the following item and go on to page 23, Occupational Instruction Programs.

6. Does this institution publicly disclose information about bankruptcy proceedings that are underway or planned? Fill in one oval for each option.

	No	Yes	
6a	○	○	This information is disclosed to all enrolled students.
6b	○	○	This information is disclosed to all prospective enrollees.

Occupational Instruction Programs

Rationale for this topic: There is no intent in this section to gather indicators of the "quality" of an institution's instructional program. This is a complicated task better handled by the accreditation or approval process. The intent of this section is to gather descriptive indicators of institutional practices which are viewed as essential for the maintenance and improvement of quality. In the occupational/vocational program area, students (and employers) generally expect training to result in certain very specific skill outcomes. If the institution does not take definite steps to see that these outcomes are achieved in its graduates, it is in danger of malpractice. We have no definitive catalog of such steps (if we did, we would start a school); we have included practices about which there is general agreement.

1. Does this institution maintain and utilize advisory committee(s) on curriculum content? Fill in one oval for each option.

	No	Yes	
1a	○	○	For some of the occupational/professional preparation program areas offered at this institution.
1b	○	○	For all occupational/professional preparation program areas offered at this institution.

If you filled in "no" for both options to item 1 above, skip item 2 and go on to item 3.

Rationale for item 1: Institutions lacking such advisory bodies tend to insulate themselves and their curricula from current practices and technology in business, industry, and government, and in so doing they jeopardize the chances of their students for placement in jobs appropriate to the type of training which they have completed.

2. Do these committee(s) include representatives of potential employers? Fill in one oval for each option.

	No	Yes	
2a	○	○	For some of the occupational/professional preparation program areas offered at this institution.
2b	○	○	For all occupational/professional preparation program areas offered at this institution.

3. Do all of the occupational/professional preparation programs in this institution possess specialized/professional accreditation, if this is a requirement for the employment of graduates in those occupations or professions? Fill in one oval.

No Yes
3a ○ ○ ○ Specialized/professional accreditation is not required for any position in any occupation or profession for which this institution provides preparation.

4. Do all of the occupational/professional preparation programs in this institution provide sufficient training in the use of basic tools and equipment, if this is a requirement for the employment of graduates in those occupations or professions? Fill in one oval.

No Yes
4a ○ ○ ○ Training in the use of basic tools and equipment is not required for any position in any occupation or profession for which this institution provides preparation.

5. Do all of the occupational/professional preparation programs in this institution provide for internships and/or supervised practice on the job, if this is a requirement for the employment of graduates in those occupations or professions? Fill in one oval.

No Yes
5a ○ ○ ○ Internships and/or supervised practice on the job are not required for any position in any occupation or profession for which this institution provides preparation.

6. Do all of the occupational/professional preparation programs in this institution provide for internships and/or supervised practice in simulated job situations, if this is a requirement for the employment of graduates in those occupations or professions? Fill in one oval.

No Yes
6a ○ ○ ○ Internships and/or supervised practice in simulated job situations are not required for any position in any occupation or profession for which this institution provides preparation.

7. Do all of the occupational/professional preparation programs in this institution provide for instruction on topics necessary for state or professional certification in this state, if such certification is a requirement for the employment of graduates in those occupations or professions? Fill in one oval.

	No	Yes		
7a	○	○	○	State or professional certification in this state is not required for any position in any occupation or profession for which this institution provides preparation.

8. Does this institution require reviews of the relevance and timeliness of all of its occupational/professional preparation curricula once every two years or more frequently? Fill in one oval.

	No	Yes
8a	○	○

Occupational Instruction   Equipment and Facilities

Rationale for this topic area: Some schools impose outdated or improperly functioning equipment on their students. This affects how adequately graduates are prepared for employment once they complete their instructional program. Some schools start new programs but fail to purchase the amount and type of equipment needed to run the program. Both types of practice are abusive.

1. Does this institution utilize advisory committees on instructional equipment and facilities? Fill in one oval.

	No	Yes
1a	○	○

If you filled in "no" to item 1 above, skip item 2 and go on to item 3.

2. Do these advisory committees include representatives of potential employers? Fill in one oval for each option.

	No	Yes	
2a	○	○	For some of the occupational/professional preparation program areas offered at this institution.
2b	○	○	For all occupational/professional preparation program areas offered at this institution.

3. Does this institution annually expend sufficient funds for replacing worn or outdated instructional equipment (including lab and other non-classroom equipment)? Fill in one oval.

	No	Yes
3a	○	○

4. Does this institution annually expend funds for new instructional equipment (including lab and other non-classroom equipment) sufficient to meet projected program needs? Fill in one oval.

	No	Yes
4a	○	○

Additional Comments

Please write additional comments in the space below. If you are commenting on specific items, be sure to include the section and item number.

Section and Item Number	Comment

APPENDIX N

MODIFICATIONS TO OCCUPATIONAL TRAINING INSTITUTIONAL REPORT FORM FOR POSTSECONDARY DEGREE GRANTING INSTITUTIONS/PROGRAMS

1. The following items are added to the section on Disclosure in Written Documents, on page 12.

   Does this institution provide accurate descriptions of the following institutional conditions or procedures regarding the award of degrees?

   Yes No

   ┌── No state agency exists for this purpose.

   2h ○ ○ ○ Recognition by state agency as meeting established educational standards for granting degrees.

   2i ○ ○ Scope and sequence of required courses or subject areas in each degree program.

   ┌── There is no transfer between departments and/or colleges.

   2j ○ ○ ○ Policies and procedures regarding transfer between departments and/or colleges within the institution.

2. The sections on Occupational Instruction Programs and Occupational Instruction Equipment and Facilities (pages 23-26) are removed if the institution has no occupational/professional preparation programs.